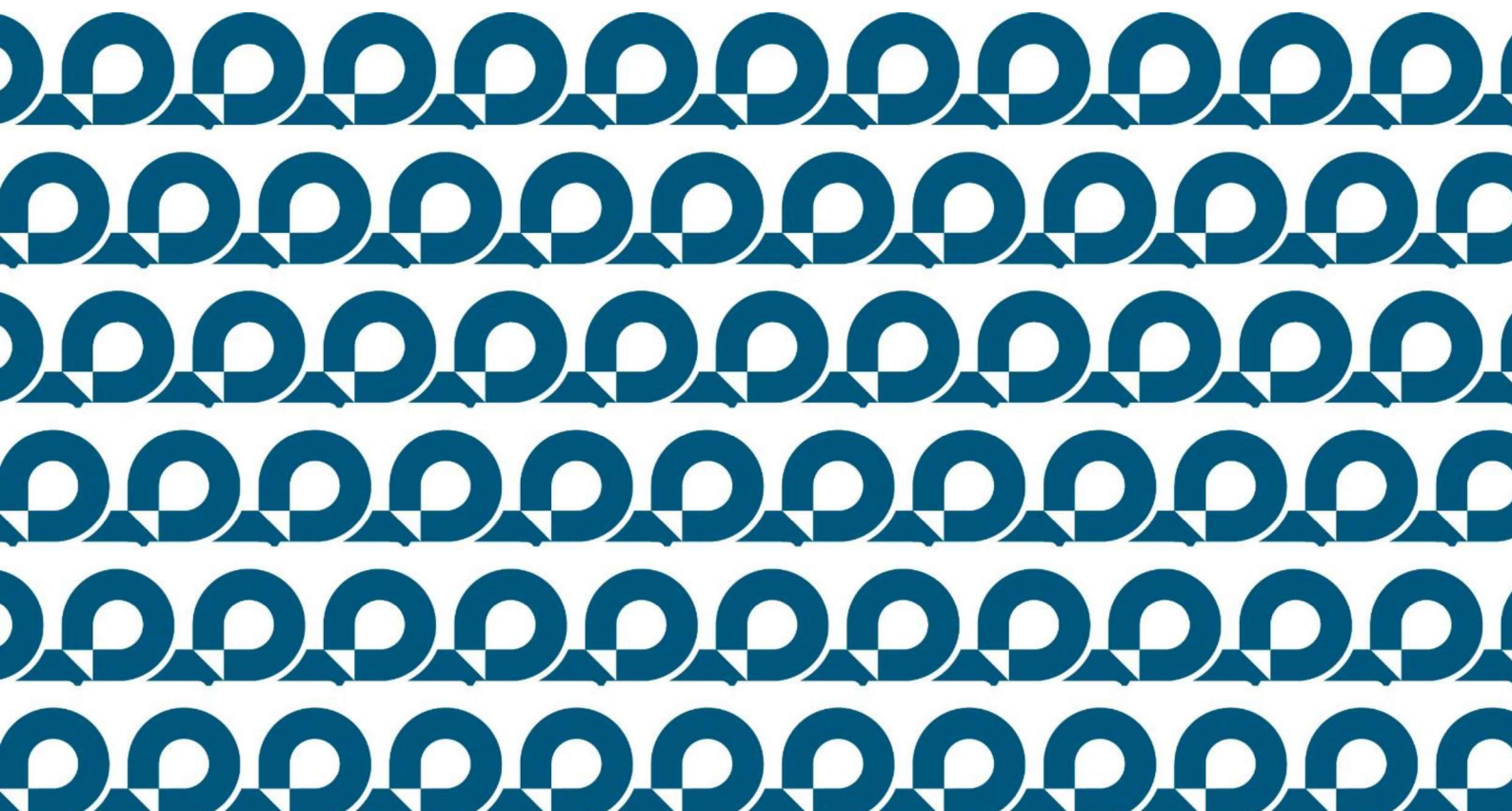




REPORT ON THE NON-FINANCIAL  
STATEMENT OF  
NUEVA PESCANOVA, S.L.,  
AND ITS GROUP COMPANIES,  
FOR THE YEAR 2019

*This is a free translation of a document originally written in Spanish.  
In the event of any discrepancy, the Spanish language version prevails.*



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## I. INTRODUCTION

The Report on the Non-financial Statement (hereinafter, the Report) of the Nueva Pescanova Group (hereinafter the Group) has been authorized for issue by the Board of Directors of the parent company (Nueva Pescanova, S.L.), in the terms and with the content set out in Law 11/2018, of 28 December, amending the Commercial Code, the consolidated text of the Companies Law approved by Royal Legislative Decree 1/2010 of July 2, and Law 22/2015, of July 20, Audit of Accounts, on non-financial information and diversity; and is part of the Management Report for the year ended December 31, 2019 of the Consolidated Annual Accounts of Nueva Pescanova, S.L.

The Report includes information on environmental, social, people, human rights, anti-corruption and bribery issues, as well as other information on the Group, in accordance with the requirements set out in Law 11/2018 and taking into account the International Global Reporting Initiative (GRI) framework. In accordance with these regulations, the Report have been verified by the independent external firm, KPMG Asesores, S.L.

The scope of the information contained in this Report comprises all Nueva Pescanova Group companies that are included in the consolidation scope, with the exception of Katei Alimentación, S.L.U., a company under consideration as at December 2, 2019, since its contribution in the consolidated context at issue here is not significant.

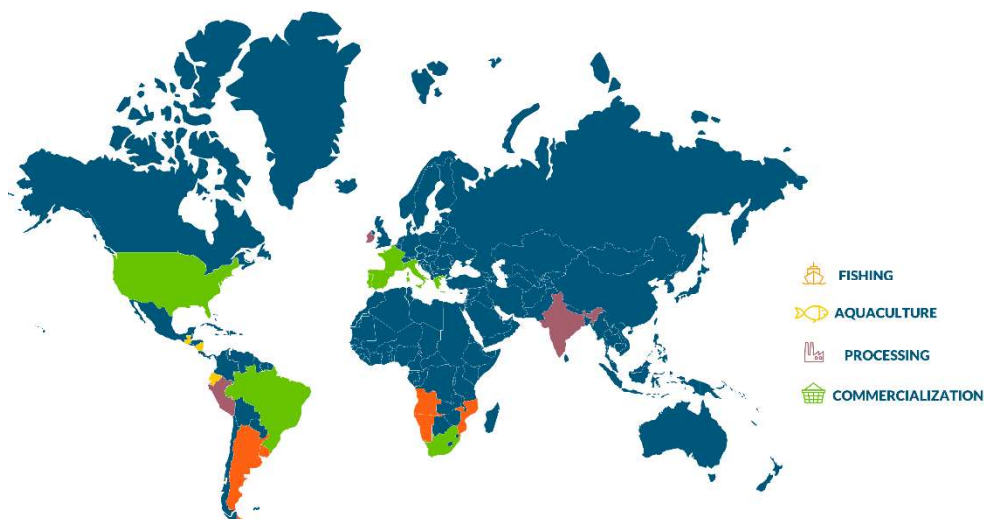
## II. GENERAL ISSUES ON THIS NON-FINANCIAL STATEMENT FOR THE 2019 FINANCIAL YEAR

### 1. Business model

#### 1.1 Overview and major markets

The Nueva Pescanova Group is a Spanish multinational company engaged in capture fisheries, aquaculture, processing, and commercialization of seafood products that was born to transform the seafood industry and bring the freshness of the sea to consumers' tables.

With more than 10,000 employees, we are present in 19 countries on four continents, selling almost 70 seafood species in more than 80 countries.



The Nueva Pescanova Group has had the opportunity to fully transform itself to become a leader, a leadership that is sustainable overtime and is recognized internationally for all its activities.

Within this process, the Nueva Pescanova Group has shaped its current **DNA**, which gives life and meaning to the whole Group. **Our DNA** is based on three basic pillars:



**We work** together to be the best food company in the market by bringing the freshness of the sea to the consumer's table.

The Nueva Pescanova Group is one of a kind in the seafood sector due to the level of vertical integration. The control over seafood products from origin to market is one of our differential values, which allows to have a fully traceable value chain to always offer the best quality to consumers.



#### **WE FISH**

With **70 fishing vessels**  
In the best fishing grounds of the Southern Hemisphere:  
**Argentinean red shrimp, cephalopods and hake**, to name a few, in South America  
**Prawns, hake and kingklip**, to name a few, in Africa



#### **WE FARM**

In a 7,500 ha farming area:  
**Vannamei shrimp** in Ecuador, Guatemala and Nicaragua.  
**Turbot** in Spain.



#### **WE PROCESS**

In **25 processing plants** located in **10 countries**:  
Spain, Peru, Ecuador, France, Namibia, Nicaragua, Guatemala, Argentina, Ireland and India



#### **WE SELL**

In **80 countries** on 5 continents.  
Our commercial offices are located in:  
Spain, France, Greece, Italy, Portugal, USA, Brazil, Peru and South Africa.



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

We have been bringing the best seafood to millions of homes around the world for almost 60 years, making innovation, freshness and quality the hallmarks of the **Pescanova** brand. Today, in the Spanish market, our brand is at the 'top of mind' of consumers, being the 5<sup>th</sup> brand in household penetration and ranking 8<sup>th</sup> among the most chosen brands by Spaniards, according to Kantar Worldpanel's 'BrandFootprint Spain2019'.

In addition, we are working to launch a R&D&I Center that will be an international reference in Aquaculture: the **Pescanova BioMarine Center**. This facility, located in O Grove (Spain), will mark a turning point in aquaculture studies worldwide through our research techniques on genetics, nutrition and health, as well as in sustainability. With its research we will be able to improve, not only the farming of species such as turbot or vannamei shrimp, but also find better techniques to assist in the rearing of new species, such as octopus. The 4,000 m<sup>2</sup> facility will be equipped with the latest technology and will position the Group as an international leader in aquaculture R&D&I.





**We believe** our first responsibility is the sustainability of natural resources and of our partner communities, whose trust we build and maintain by acting ethically and creating value.

Respect for the planet and the communities in which we are present, for the people who make up the Nueva Pescanova Group and the commitment to the markets through our products, are the pillars that support our *Corporate Social Responsibility Strategy*.



#### PLANET

The sustainable management of natural resources and respect for ecosystem and the environment, to ensure availability and quality for future generations, guarantee the success of our operations and the future of our Group.



#### PEOPLE

The respect for diversity, safety, professional growth and the pride of belonging to the Group are the foundations of our success along with the trust relationships with suppliers, customers, consumers and communities.



#### PRODUCT

Facilitating the access of nutritious, healthy, tasty, innovative and responsibly produced seafood products to the markets.



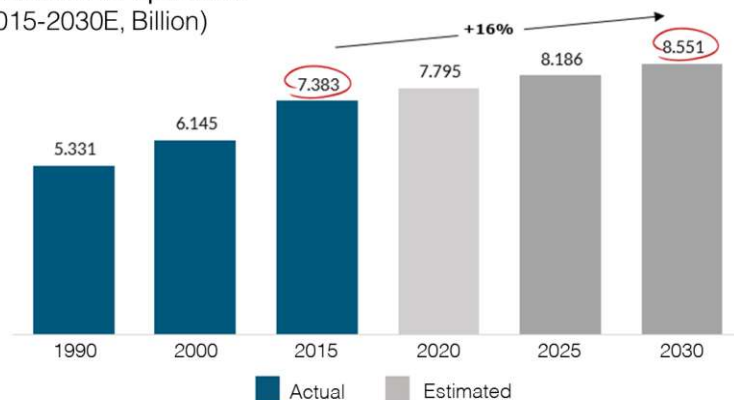
#### COMMUNITIES

We acknowledge the value of seafood products and we strive for the development of more prosperous communities by generating wealth and job and training opportunities wherever we are present.

## 1.2 Business environment, competitive framework, and future trends

The expected increase in the world's population and economic growth will affect demand for food and animal protein. By 2030, the world's population is expected to reach 8.5 billion, which will mean an increase in demand for marine protein:

**Projected World Population**  
(1990-2015-2030E, Billion)

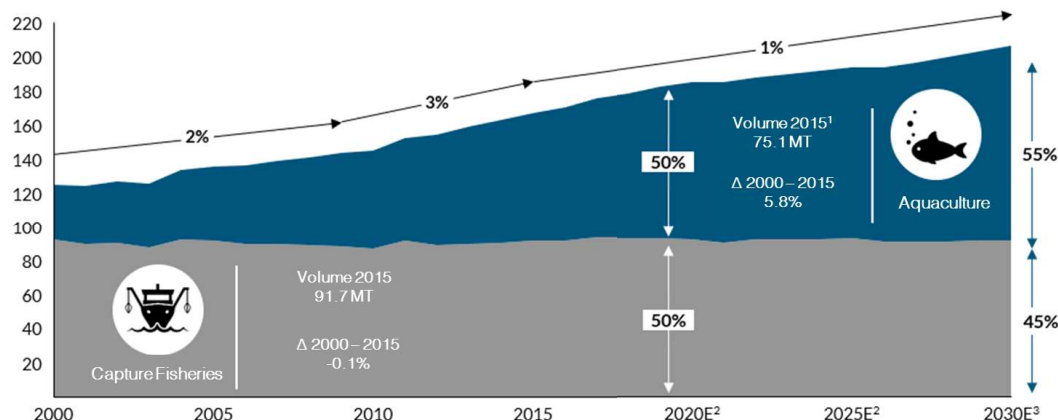


**The growing world's population supports the increase in fish protein intake**

Source: Nueva Pescanova compilation based on FAO's reports.

Aquaculture is the answer to meet the increasing demand for marine protein since capture fisheries productions will remain stable, subject to the continuous search for sustainable resources and their preservation. In this regard, according to FAO's estimates, farmed species are expected to contribute a 55% share of the global marine protein available by 2030:

**Evolution and projection of global fisheries production**  
(1990-2015-2030E, MT of live weight)



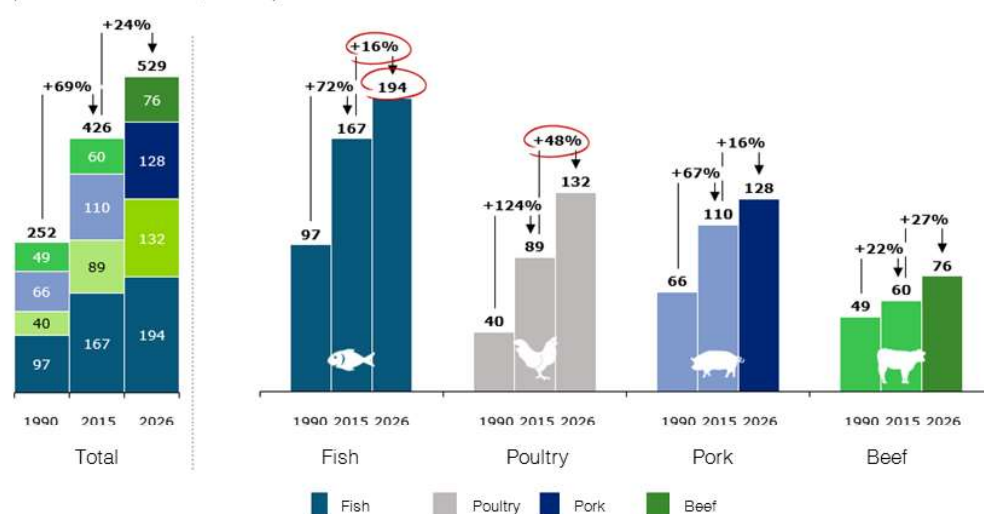
**This has led us to define a strategy that enhances the level of integration and development of the group's aquaculture división**

(<sup>1</sup>) Includes FAO's estimated data for 2015 (<sup>2</sup>) Global Fisheries Production as projected by FAO (<sup>3</sup>) Projected Global Fisheries Production based on the estimated growth from 2015 to 2026

Source: OECD, FAO, Monitor Deloitte.

Marine protein competes with other animal proteins, the charts below show the expected growth in poultry, pork, and veal/beef production for the 2015-2026 period:

**Projected global consumption of fish, poultry and livestock**  
(1990-2015-2030E, Billion)



Source: Nueva Pescanova compilation based on OECD and FAO data.

Fishery products consumption is a habit and tradition in many countries, being a primary source of essential nutrients. Seafood consumption provides energy, protein, and other important nutrients, such as long-chain polyunsaturated fatty acids. All this makes it possible to foresee that the demand for seafood consumption will keep on increasing.

From an operational point of view, the main risks and uncertainties of the Nueva Pescanova Group are associated with its activities, mainly fishing and aquaculture, being closely linked to exogenous factors related to weather, biology, regulations and macroeconomy. That is why geographical diversification of origins (fishing and aquaculture) is a key factor in mitigating these risks. The risk does not go away, but its likelihood and impact on the Group's operating results are significantly reduced.

### 1.3 Organization and structure of the Nueva Pescanova Group

The governing body of the parent company of the Nueva Pescanova Group (Nueva Pescanova, S.L.), is a Board of Directors, consisting of 12 members and organized in 3 committees that have their own rules and regulations.



#### Governance and Corporate Responsibility Committee

With competencies in appointments and corporate governance, remuneration, business ethics, institutional integrity, and regulatory compliance (Compliance).



#### Audit, Control and Finance Committee

With competencies in the field of the Internal Control System, Financial Reporting, the process of authorizing the issue of Annual Accounts and monitoring Auditors' work.



#### Commerce and Strategy Committee

With competencies in the field of commercial strategy and compliance with the Group's Strategic Plans.

At a corporate level, the Nueva Pescanova Group is organized around a functional or matrix structure. The Executive Committee of the Nueva Pescanova Group (which we internally call COMEX) consists of the CEO, the Chief Officers of each of the Business Divisions (Fishing, Aquaculture, Global Supply Chain, Commercial and Marketing) and the Chief Officers of the Cross-Functional Divisions (Finance and Administration, Internal Audit, Human Resources, Legal Advice and Compliance, and Corporate Social Responsibility and Institutional Relations) and, last, the Chief Projects Officer (Industrial Transformation).

## 2. Corporate Social Responsibility (RSC)

As explained in the previous Chapter, **Our DNA** reads that one of the indispensable principles on which our business is based is our commitment to the sustainability of natural resources and of our partner communities, whose trust we build and maintain by acting ethically and creating value.

The Nueva Pescanova Group's **CSR Master Plan** is based, precisely, on this **DNA** and founded on respect for the **Planet**, the personal and professional development of the **People** who make up the Group, the commitment to the markets through our **Products** and the contribution to improving the quality of life of the **Communities** in which we are present, all ensuring the comprehensive observance of the principles of **business ethics, institutional integrity and compliance with applicable regulations**, as provided in **Our Code of Ethics** and other provisions in our **Corporate Governance and Compliance Regulatory System**.

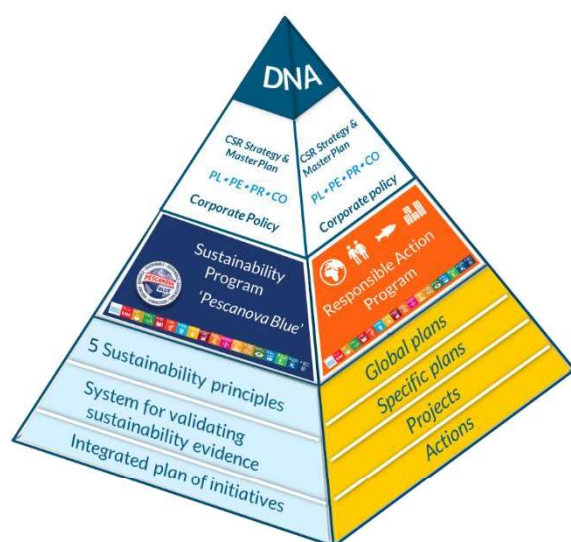
Our *CSR Strategy* also bears in mind our *Partners*, who make possible the existence and growth of the Group, and *Society* in general, which allows us to develop our activities: fishing, aquaculture, processing and commercialization of seafood products through the creation of shared value.

Likewise, we understand and take into consideration the responsibility that our Group has with its stakeholders and with society as a whole, taking into account its changes and demands that today are particularly sensitive, especially with regard to the environmental impact of business activity, fair and equal treatment of workers and social rights and, in short, good corporate governance (Environmental, Social and Governance (ESG) aspects).

That is precisely why, in 2019, and in the preparation of our *CSR Master Plan*, we have focused on Environmental, Social and Governance (ESG) issues, reinforcing good governance, launching the *Sustainability Program* 'Pescanova Blue' that strengthen our commitment to sustainability with special emphasis on environmental and social aspects, and beginning the implementation of our *Responsible Action Program* that builds up Plans and Projects based on our commitment to Planet, People, Products and Communities. We have also worked on transparency through various publications on our corporate website, disclosing many of the policies approved and disseminating materiality and contribution to sustainable development reports <http://www.nuevapescanova.com/en/engagement/corporate-social-responsibility/>).

As proof of our strong commitment to the UN 2030 Agenda for Sustainable Development Goals in 2019 we joined, as signatories, the UN *Global Compact* initiative, and the *Spanish Global Compact Network*.

All this has enabled the international recognition of the Nueva Pescanova Group as the first fishing company and the fifth among the leading international seafood companies when measuring our contribution to the UN 2030 Agenda for Sustainable Development Goals, according to the *World Benchmarking Alliance*.



Outline of our CSR Master Plan which, based on our DNA and guiding principles: Planet, People, Product and Communities, defines corporate and sectoral policies, and establishes Responsible Action and Sustainability Programs.



## 2.1 Governance

As mentioned in 2) above, in 2019 we have reinforced governance in **CSR** by approving the following Corporate (global) and Sectoral (divisional) Policies (related to an Activity Division or Business Unit), which are the basis of responsible action and our Group's commitments and approach in this field:

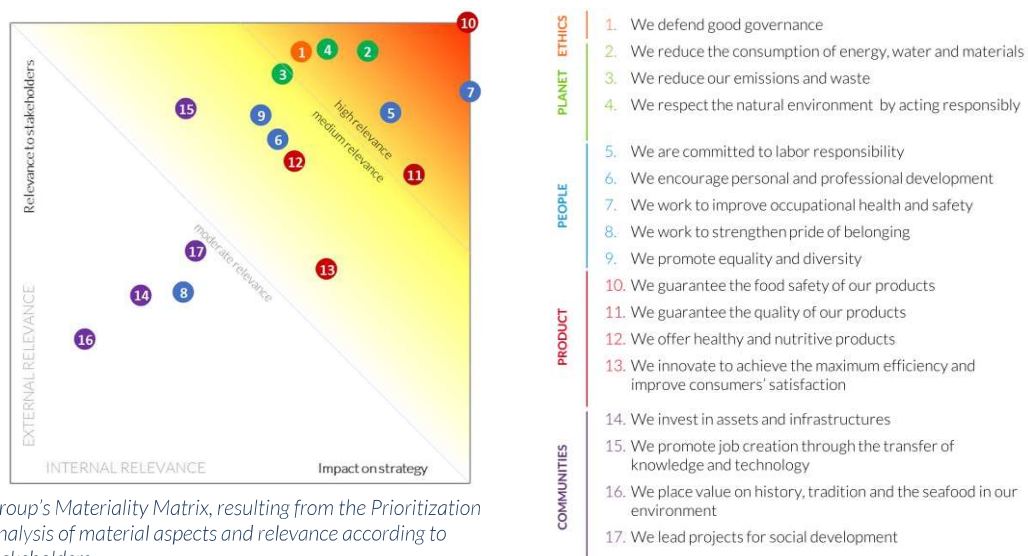
- (i) *Corporate Policy on Corporate Social Responsibility.*
- (ii) *Corporate Policy on Sustainability.*
- (iii) *Corporate Policy on Cooperation and Development Aid.*
- (iv) *Sectoral Policy on Responsible Capture Fisheries.*
- (v) *Sectoral Policy on Responsible Aquaculture.*
- (vi) *Corporate Policy on Corporate Volunteering.*
- (vii) *Corporate Policy on Institutional Relations.*

## 2.2 Materiality

Over the years the Nueva Pescanova Group, through the companies that make up the Group of companies in the Fishing, Aquaculture, Industrial and Commercial Activity Divisions, has promoted specific projects and actions related to its four **CSR** pillars (**Planet, People, Products and Communities**) previously mentioned. These actions have been inventoried and documented by our “**CSR Ambassadors**” led by the Global Corporate Social Responsibility and Institutional Relations Office (CSR & IR Office).

These projects (226), duly inventoried and documented, during 2018, in the Group companies in Ecuador (PROMARISCO), Nicaragua (CAMANICA), Guatemala (NOVAGUATEMALA) and Namibia (NOVANAM) have made possible to establish **17** relevant **material aspects** to our business that, in turn, have been analyzed and aligned in relation to the Sustainable Development Goals (SDGs) of the UN 2030 Agenda.

For the identification and prioritization of these **17 material aspects**, the methodology offered by the **Global Reporting Initiative** Guide (G4 version) was followed, in accordance with the following steps: (i) Identification of relevant aspects affecting or likely to affect the Group's ability to create value; (ii) Assessment of the importance (prioritization) of relevant matters for each of the stakeholders; (iii) Validation and review of materiality and its results; and finally, (iv) preparation of the **Materiality Matrix** of the Nueva Pescanova Group on the basis of the material aspects prioritized by representatives of external and internal stakeholders, the graph of which is shown below:



Our **Materiality Analysis** identifies, among the above **17 material aspects**, those that are relevant to our stakeholders and, at the same time, are relevant to the Group's strategy and its business model. The five priority material aspects, from the point of view of relevance and alignment with the Nueva Pescanova Group's strategy, are:

- (i) Ensure the food safety of our products;
- (ii) Occupational safety and health;
- (iii) The reduction of energy, water, and materials usage;
- (iv) Commitment to labor responsibility; and
- (v) Respect for the natural environment by acting responsibly.

The result of the analysis, shown in our **Materiality Matrix**, has allowed us to establish responsible and sustainable principles of action that are implemented through the aforementioned **Sustainability Program 'Pescanova Blue'** and the **Responsible Action Program** that establish plans, projects and actions that allow the Group to create economic, social and environmental value in a shared manner, and aligned with its stakeholders.

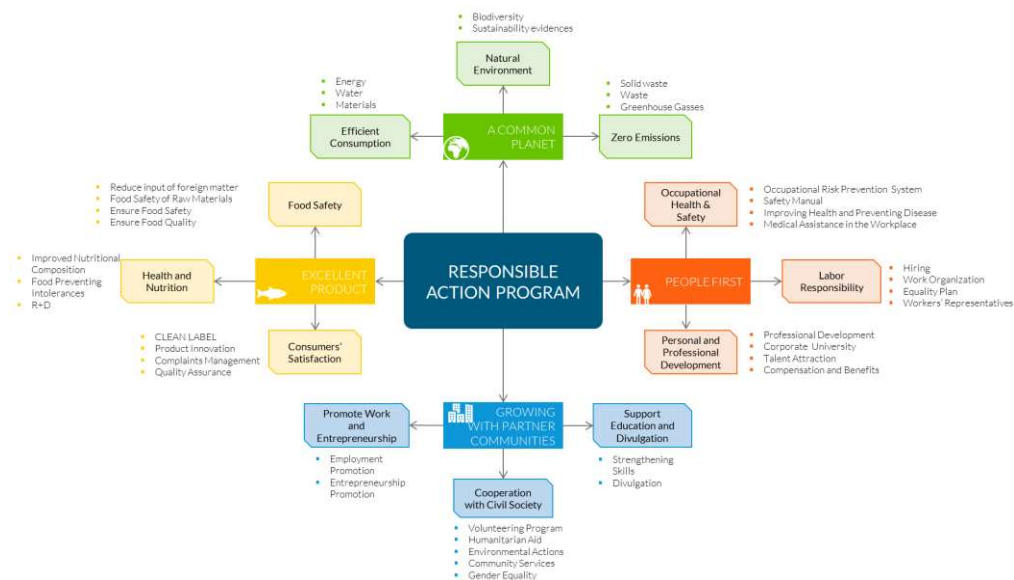
## 2.3 Action Programs

### 2.3.1 Responsible Action program

The **Responsible Action Program** (hereinafter, **RAP**) is set out in 4 general plans inspired by the guiding principles of the **CSR Master Plan**:

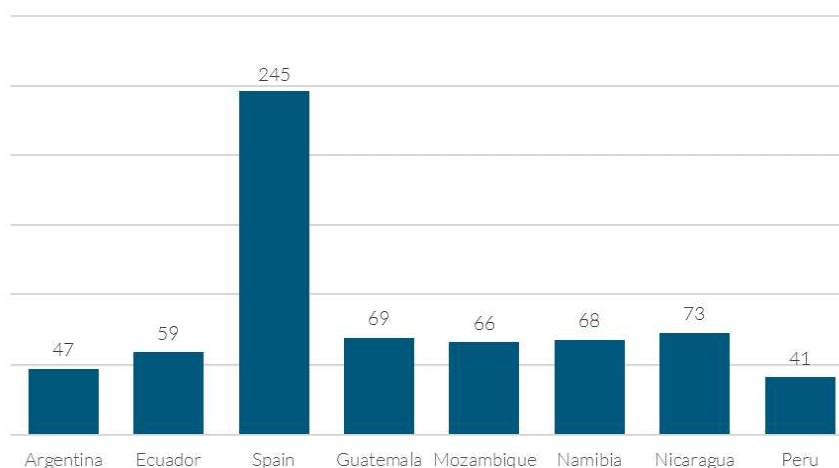
- (i) 'A Common Planet;
- (ii) 'People First;
- (iii) 'Excellent Product; and
- (iv) 'Growing together with our partner Communities'.

These 4 general plans are in turn expanded in 12 specific plans that respond to the material aspects identified as relevant in our *Materiality Matrix* and to business-related topics and their environmental, social, or economic impact. At present there are 40 topics, grouped into projects and actions that are implemented in all companies of the Group:



To manage the *RAP*, we prepared a *CSR* action management tool, called the '*RAP switchboard*', which serves as a database and updated repository of the General and Specific Plans and Projects, documenting and measuring the progress of all the actions included within the framework of the Group's *CSR Strategy*.

In 2019, a total of 668 actions have been inventoried and documented in the Group companies in the following countries and business divisions: Argentina, Mozambique, Namibia and Peru in the Fishing Division; Ecuador, Guatemala and Nicaragua in the Aquaculture Division; and Spain in the Global Supply Chain Division, as shown in the chart below:



These actions are grouped in the relevant General and Specific Plans in our *Responsible Action Plan (RAP)*:

			
<b>A COMMON PLANET</b>	<b>209</b>	<b>PEOPLE FIRST</b>	<b>269</b>
01 Natural environment	72	01 Occupational health and safety	99
02 Efficient consumption	81	02 Labor responsibility	47
03 Zero emissions	56	03 Personal and professional development	123
			
<b>EXCELLENT PRODUCT</b>	<b>81</b>	<b>WE GROW TOGETHER WITH OUR PARTNER COMMUNITIES</b>	<b>109</b>
01 Health and nutrition	14	01 Support education and divulgation	27
02 Consumer satisfaction	52	02 Promote work and entrepreneurship	26
03 Food safety	15	03 Cooperation with civil society	56
<b>- TOTAL 668 ACTIONS -</b>			

### 2.3.2 Sustainability Program 'Pescanova Blue'

The *Sustainability Program 'Pescanova Blue'* is the Nueva Pescanova Group's operational answer to its positioning in the already mentioned 4 *CSR* pillars (*Planet, People, Product* and *Communities*) through:



- The definition of five sustainability principles in the areas of **sustainable sourcing**, **labor responsibility**, **responsible operations**, **more prosperous communities**, and **ethical and upright behavior** aligned with our compliance obligations and objectives.
- A system for validating **sustainability evidence** in the environmental, social, and economic spheres.
- A **comprehensive plan of initiatives** designed to drive and document the sustainable use of natural resources and responsible action in the activities carried out by the companies of the Nueva Pescanova Group.

Activities related to our *Sustainability Program* are governed by the *Corporate Policy on Sustainability* of the Nueva Pescanova Group.

Regarding sustainable sourcing, the *Sustainability Program 'Pescanova Blue'* uses 4 types of sustainability evidence:

- **Type I – Third-party audit certificates** from private sustainability benchmarks (*ecolabels*) for fisheries or aquaculture that comply with FAO's responsible fishing principles, such as sustainability certification schemes recognized by the *Global Sustainable Seafood Initiative (GSSI)*.
- **Type II – Compliance with the requirements of the Private Sustainable Fisheries Benchmark** of the Nueva Pescanova Group in force for the different countries or species.



- **Type III – Complementary actions on fisheries and/or aquaculture sustainability**, such as fisheries improvement projects (FIPs) or aquaculture improvement projects (AIPs) managed and documented in a transparent and adequate manner.
- **Type IV – Compliance with fisheries performance assessment** criteria according to globally accepted sustainability measures in accordance with FishSource scientific profiles platform.

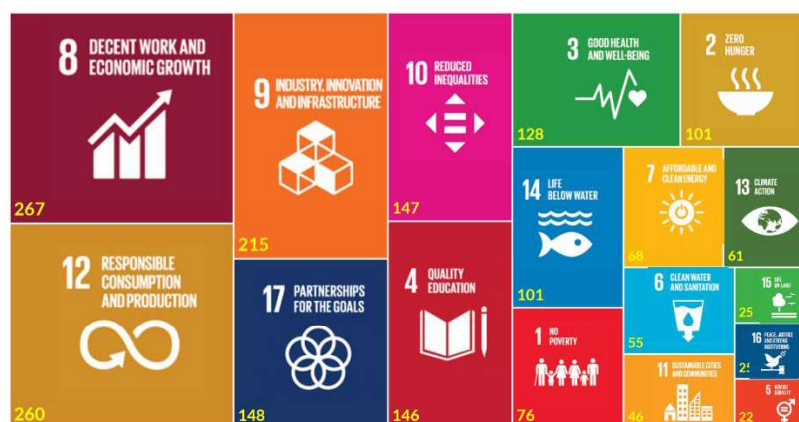
In the context of the *Sustainability Program* 'Pescanova Blue' we have approved **General Procedure for the Approval of Raw Materials from Sustainable Capture Fisheries or Aquaculture** and the **Visual Identity Manual for the Conformity Label 'Pescanova Blue'** (internal standards described in section 4 of this Chapter), guaranteeing the sustainable origin of all our products and, therefore, eligible to carry the 'Pescanova Blue' label on Pescanova brand packages. In addition, soon the Group will be able to publish its annual reports on sustainable capture fisheries raw materials.

## 2.4 Sustainable Development Goals

Our *CSR Master Plan*, the *Responsible Action Program*, and the *Sustainability Program* 'Pescanova Blue' are aligned with the UN 2030 Agenda. This alignment has been nailed down in the adoption of commitments to Sustainable Development Goals (SDGs) in all our activities. This commitment is relevant to all the countries where the Nueva Pescanova Group is present.

We believe in the role that the SDGs play in society and the economy in improving the quality of life and our environment. For this reason, on October 30, 2019 we joined the Spanish Network of the *United Nations Global Compact*. This is the largest association of private companies and public entities that have aligned their strategies and operations with 10 universal principles on human rights, labor, environment and anti-corruption, which also has a mandate of the UN to promote Sustainable Development Goals (SDGs) in the private sector.

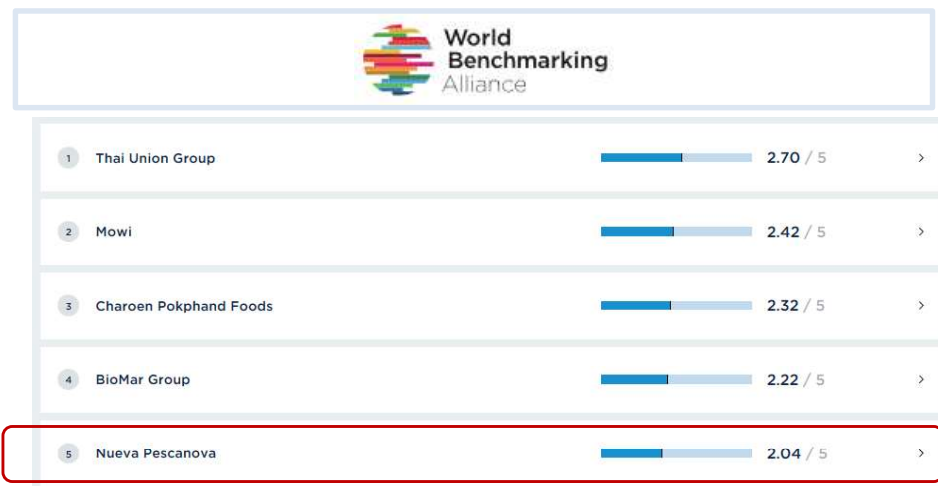
The **668 actions** documented by the above-mentioned *RAP*, within the Group's Corporate Social Responsibility, through the achievement of its 169 specific targets and their contribution to SDGs, show how the Nueva Pescanova Group is contributing to each of the 17 goals. Thus, our *RAP* sees reflected its performance in the 17 SDGs, with a greater impact on Objectives nº 8 "Decent work and economic growth", nº 12 "Responsible consumption and production" and nº 9 "Industry, innovation and infrastructure":



Number of CRS projects and their contribution to each Sustainable Development Goals in the 8 countries analyzed in which the Nueva Pescanova Group is present.

## 2.5 Recognition

The work carried out in **CSR** in 2019 in the aspects of Governance, the *Responsible Action Plan* and *Sustainability Program*, as well as *transparency* through the publication of all our actions, has earned international recognition as the 1<sup>st</sup> fishing company and 5<sup>th</sup> among the top international seafood companies for their contribution to the UN 2030 Agenda for Sustainable Development Goals, according to the *World Benchmarking Alliance*.



## 3. Business ethics, institutional integrity, and regulations compliance

The Nueva Pescanova Group's *CSR Master Plan* guarantees, as discussed in the previous Chapter, the comprehensive observance of the most demanding principles of business ethics, institutional integrity, and regulatory compliance. This commitment to ethical, honest, responsible and transparent behavior is oriented and implemented through our *Corporate Governance and Compliance Regulatory System* (or *Internal Regulatory System*), that consists of Our Code of Ethics, our Providers' Ethical and Social Charter the Governance Standards for Corporate Bodies and other Internal Committees, Corporate Policies (Global), Sectoral or Local Policies (Divisional) and Internal Standards.

To ensure the knowledge and compliance with Our Code of Ethics and the other standards that make up this *Internal Regulatory System* we have our *Compliance Unit* headed by the Group's *Chief Ethics & Compliance Officer* who, among other functions and competencies contained in Our Code of Ethics and in own Operating Rules, informs and advises employees of the Group so that they may have in-depth knowledge on the guidelines and work in line with them. Likewise through the *Compliance Channel* (in the web application hosted on the corporate intranet PESCANET, in addition to other alternative communication channels) and managed by the Compliance Unit, any professional of the Group may submit any query on this matter and report possible non-conformities or breaches of our Regulatory System.

## 4. Group's Policies relevant to the Non-Financial Statement

At December 31, 2019, the main policies of the Nueva Pescanova Group with an impact on the issues referred to in the Non-Financial Statement (environmental, social and related to our people, respect for human rights, anti-corruption and related to society and other stakeholders) are summarized below:

- *Our Code of Ethics.*
- *Providers' Ethical and Social Charter of the Nueva Pescanova Group.*
- *Corporate Policy and Risk Control and Management Manual.*
- *The Internal Audit Charter.*
- *Compliance Unit Regulations.*
- *Corporate Policy on Good Business Practices in Food Contracting and Conflict Resolution.*
- *Corporate Criminal Risk Prevention Policy.*
- *The Anti-Corruption Code of the Nueva Pescanova Group.*
- *Regulations and Privacy Policy of the Compliance Channel.*
- *Corporate Procedure for the drafting of Internal Regulations (Standard O).*
- *Corporate Personal Data Protection Policy.*
- *Standard Procedure for Food Donations.*
- *Corporate Policy and General Procedure on Procurement.*
- *Corporate Policy and General Procedure for Travel and Representation Expenses.*
- *Corporate Policy and General Procedure on Talent Management.*
- *Corporate Policy and General Procedure for Recruitment, Selection, Onboarding and Offboarding.*
- *Corporate Policy Occupational Safety and Health.*
- *Corporate Policy on Proxies.*
- *Corporate Policy on Corporate Social Responsibility.*
- *Corporate Policy on Institutional Relations.*
- *Corporate Policy on Sustainability.*
- *Corporate Policy on Cooperation and Development Aid.*
- *Sectoral Policy on Responsible Capture Fisheries.*
- *Sectoral Policy on Responsible Aquaculture.*
- *Corporate Procedure for the Approval of Raw Materials from Sustainable Capture Fisheries and Aquaculture.*
- *Visual Identity Manual of the 'Pescanova Blue' Conformity Label.*
- *Corporate Policy on Corporate Volunteering.*
- *Corporate Policy on Quality and Food Safety.*
- *Corporate Policy and General Procedure for the Management of International Mobility.*
- *Protocol of Action in the field of Mobbing, Sexual and/or Gender Harassment and Discrimination of Pescanova España, S.L.U.*
- *Integrity Program Manual of ARGENOVA, S.A.*

## 5. Risks related to issues included in the Non-Financial Statement

The Nueva Pescanova Group is subject to various inherent risks in the different countries, activities, and markets in which it operates. Therefore, the relevant corporate risks of all the Group's activities and businesses are adequately identified, assessed, managed and controlled, having established the basic mechanisms and principles for an adequate management of the same, with a level of risks that allows to: **(i)** Achieve the group's strategic objectives, by taking control of volatility; **(ii)** Provide the highest level of guarantees to partners; **(iii)** Protect the Group's results and reputation; **(iv)** Defend the interests of partners, customers, suppliers and other stakeholders; and **(v)** Ensure the Group's business stability and financial strength in a sustainable manner over time.

For the management of risks, the Board of Directors of Nueva Pescanova, S.L., has set up an Audit, Control and Finance Committee that, as advisory body of the Board, supervises and reports on the evaluation, control and monitoring of relevant risks, in coordination with the Global Internal Audit Department and the different Business and Cross-functional Departments of the Group, which have the task of implementing specific risk policies, regardless of the powers related to governance and corporate responsibility (including non-financial reporting issues), on an advisory basis, have been granted to the Governance and Corporate Responsibility Committee, in coordination with the Compliance Unit and the Global Corporate Social Responsibility and Institutional Relationships Office.

The Nueva Pescanova Group has its own *General Map of Inherent Risks* on which 40 relevant risks have been assessed, considering their impact and probability of occurrence. As regards the inherent general risks assessed related to the Non-Financial Statement, the following stand out: **(i)** Country Risk, **(ii)** Food Security, **(iii)** Occupational Safety and Health, **(iv)** Regulatory Violations and **(v)** Overfishing of marine resources. The review of the General Map of Inherent Risks is carried out annually by the Executives of the Group, being supervised, approved, and validated by the Board of Directors.

Similarly, the assessment of the inherent criminal risks relevant to the Group in Spain – taking into account the system of criminal liability of legal entities and the ancillary consequences of articles 31 bis and 129 of the Spanish Criminal Code–, is contained in our *Matrix of Criminal Risks and Controls*, which is an integral part of the *Criminal Risk Prevention Program of the Nueva Pescanova Group* (which also includes the Corporate Policy on the Prevention of Criminal Risks, the Manual for the Prevention of Criminal Risks (General Part), the Manual of Prevention of Criminal Risks (Specific Part), and the Guidelines for the Supervision and Monitoring of the Criminal Risk Prevention Program). In view of the Group's activities, for the purposes of Non-Financial Statement, the relevant inherent criminal risks are: **(i)** Corruption between individuals and public authorities or officials in international business activities; **(ii)** The omission of occupational safety and health measures in breach of occupational risk prevention rules; **(iii)** The conduct of polluting activities in violation of the rules for the protection of natural resources and the environment; **(iv)** The shipping, dispatch, handling or alteration of medicinal products for veterinary use; **(v)** Improper handling or adulteration of food, additives or other food agents; **(vi)** Bribery of public authorities or officials; **(vii)** Trafficking influences to official or public authority.



### III. INFORMATION ON ENVIRONMENTAL ISSUES

#### 1. General Overview

Our *Materiality Analysis* (already mentioned in chapter II, section 2 of this Report) clearly identifies the priority of developing performance optimization measures for our companies that validates the improvement of the efficiency of processes and equipment with regard, in particular, to fishing, aquaculture and seafood processing activities. This *Analysis* highlights the optimization of the use of natural resources and energy. In both cases, this optimization means producing more (biomass or packaged finished products) and better (more efficient and better quality), with less (resources and waste).

At the same time, we have projects to protect the natural environment, preserve biodiversity and further environmental improvement, having enforced for this purpose the *Sustainability* and *Responsible Action Policies* for the Fishing and Aquaculture Divisions.

The governance of our activities entails a commitment to compliance, measurement, reporting and transparency. The key indicators presented in the following sections comply with this commitment and are aligned with the guiding principle 'Planet' of the Nueva Pescanova Group's *CSR Master Plan*.

In addition, the *Food Safety, Quality and Environment System (FSQES)* (SACMA in Spanish) of the Nueva Pescanova Group is based on the appropriate hazard analysis and critical control points (HACCP), the identification and assurance of compliance with all legal requirements relating to food safety, quality and the environment, in each of the countries in which we are present, as well as on the certification of quality and environmental matters. This establishes the reference framework of the Nueva Pescanova Group when setting and reviewing business objectives aimed at improving our products, service to our customers and environmental respect.

The Nueva Pescanova Group, aware of its environmental responsibility, as well as the possible impact on the same that its activities may produce, is firmly committed to the protection and conservation of the environment and the prevention of pollution in all its activities, products and services. To this end:

- i. We set objectives that consider environmental aspects as an integral part of our business decisions.
- ii. We comply with applicable legal requirements (hard law) and other requirements voluntarily assumed (soft law) in all our activities, products, and services.
- iii. We promote the continuous improvement of our *Food Safety, Quality and Environment System (FSQES)*.
- iv. We develop training and/or awareness plans for our people on food safety, quality and environmental issues related to their work.
- v. We promote resources sustainability and reduction in waste for our current and future operations.
- vi. We carry out communication and awareness-raising actions on our environmental policy to all people, implementing it and keeping it present at all levels of the organization.

In this sense, the Nueva Pescanova Group has within its organization a Global R&D, Quality and Environment Office, whose responsibility is to lay down the guidelines and ensure compliance with our **Food Safety, Quality and Environment System (FSQES)**, as (described in detail in section 4 of Chapter VII of this Report. The Global R&D, Quality and Environment Office consists of 30 people in the environmental field (as of December 31, 2019), who ensure the prevention and minimization of environmental hazards in each of the Group companies. Staff cost of this team reached to 553,057 euros in the 2019 financial year.

Likewise, the Nueva Pescanova Group has an environmental liability policy, for up to 5,000,000 euros, to cover potential costs for restoring environmental and pollution damages that could arise in conducting our fish farming, logistics, commercialization, seafood processing, fishing and/or any other related activities. In 2019 the fees paid for this environmental liability policy amounted to 33,318 euros. In this sense, the Nueva Pescanova Group does not recognize any provision for risks and expenses, or contingencies related to environmental protection, since such risks are covered by the environmental liability policy.

As regards to *Certifications*, in the field of environmental management, all industrial and aquaculture centers in Spain are *ISO14001* certified, also our turbot farming operation is *EMAS (Eco-Management and Audit Scheme)* certified. As to our vannamei shrimp operations, our farms, hatcheries and processing plants have the following certificates in Ecuador (*GlobalGap, BAP* and *ASC*), Guatemala (*BAP* and *ASC*) and Nicaragua (*GlobalGap, BAP* and *ASC*). In addition, we have implemented a Private Sustainable Fisheries Benchmarking in Namibia for hake fishing, which complies with FAO's principles of responsible fishing, which is subject to independent annual audits by *Bureau Veritas* since its implementation in 2013.

The scope of the environmental data contained in this Chapter refers to all countries where we undertake fishing, aquaculture, and product processing activities, except for Ireland and South Africa as they are not significant in the context of the Nueva Pescanova Group. Therefore, the countries in which environmental risks are targeted are the following: Argentina, Ecuador, Spain, France, Guatemala, Mozambique, Namibia, Nicaragua, Peru, and Uruguay.

## 2. Sustainable use of resources

Optimizing the use of natural resources, including biological resources, aims to drive efficient production through more sustainable processes. Due to the relevance of natural resources in our activities, already identified as material in our **Materiality Analysis**, our commitment is focused on the rational use of water, materials, and energy.

### 2.1 Rational use of water

The rational use of water in the different processes identified in the companies of the Nueva Pescanova Group is a cross-cutting operational management and environmental sustainability objective. Depending on the particularities of the activity that uses this resource, a distinction is generated between the consumptive use (in which water is used for its characteristics and its quality or quantity is in some way reduced) and non-consumptive (in which the use of water is temporary and does not affect its quantity or quality, as is the case, for example, of the use of water as growing environment in aquaculture).

The table below shows the total volume of water used by source, indicating the relative usage of each of the Group companies in the respective countries and the generic activity in which it is used:

Source	Water use [×1,000 m <sup>3</sup> ]	Scope (Countries)	Assigned use
Surface water, including water from wetlands, rivers, lakes and oceans	782.7	Ecuador, Spain, Nicaragua Argentina, Namibia	Industrial use Purification through reverse osmosis, to be used by the fishing fleet and/or processing plants
Underground water	1,066.6	Ecuador, Spain, Guatemala, Nicaragua, Peru	Human consumption, washing and cleaning
Rainwater collected and stored directly by the organization	9.8	Mozambique, Nicaragua	Washing and cleaning
Municipal water supply or other public or private water services	428.4	Ecuador, Spain, France, Mozambique, Nicaragua, Namibia	Human consumption, processing, washing and cleaning
<b>Total</b>	<b>2,287.5</b>		
Water use efficiency indicator [m <sup>3</sup> /MT produced]	10.9		

#### Non-consumptive use

Surface water, including water from wetlands, rivers, lakes and oceans	2,354,585.0
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Given the importance of responsible use and consumption of water resources, we have implemented several projects to improve our performance in the activities and countries where we operate. Specific measures and projects focused on responsible water management are set out in the following sections.

#### i. Technical solutions for streamlining water usage

##### a. PROMARISCO (Ecuador)

At the processing plant of the Group company in Ecuador, PROMARISCO, we have optimized industrial processes through the installation of semi-automatic systems for the control of the maximum level of in water storage tanks, as well as through the installation of meters at specific locations in the areas where the use is greater in the process for the purification of water from the river which is used in processing lines and for the production of ice, cleaning, laundry, cooking or sanitary use. Thanks to these actions **annual savings** of fresh water have reached **41,400 m<sup>3</sup>**.

##### b. CAMANICA (Nicaragua)

At the processing plant of the Group company in Nicaragua, CAMANICA, industrial processes have been optimized through the inspection and repair of the water supply system, the acquisition of pressure washing equipment and by raising people's awareness of a rational use of water. Thanks to these actions, and by identifying investment possibilities, the water use indicator has improved by 18% achieving a water usage of **0.032 m<sup>3</sup>/kg** of shrimp processed in 2019.

In this respect, rainwater is also collected, in and around the facilities, for washing and cleaning processes, a total of **1,658 m<sup>3</sup>** were collected in 2019, about 7 times more than in the 2018.

#### c. PESCANOVA ESPAÑA (Industrial Centers)

Good water use practices have been implemented for cleaning and washing, reducing water usage and the volume of polluted wastewater reaching treatment plants (and consequent reduction in purification costs). These measures were implemented in the different Industrial Centers that the Group has in Spain and have meant a reduction of **18% (19,761 m<sup>3</sup>)** of groundwater usage compared to the previous year).

#### d. PESCAMAR (Mozambique)

A rainwater capture system has been installed, mainly from the ground in and around the facilities, this water is used for washing and cleaning processes. The amount of water collected and used in 2019 was **8,176 m<sup>3</sup>**, almost double the water collected and used in 2018.

#### e. NOVANAM (Namibia)

In our Namibian Group company, NOVANAM, we identified the following water management measures:

- Production of potable water; change of flake ice produced on land facilities from fresh water to liquid ice produced on board freezer boats from desalinated water via reverse osmosis and/or forced evaporation. This technical solution has led to a substantial reduction in freshwater usage (**freshwater savings of 14,695 m<sup>3</sup> in 2019**), and a better freezing process while maintaining product quality.
- Use of seawater instead of freshwater in the industrial process and for cleaning processing lines equipment, through the implementation of technical solutions for seawater filtration, sterilization, and purification, or through the reuse of cooling water in washing and cleaning processes. **In 2019** all this has meant a reduction of municipal freshwater usage of **1,388,308.9 m<sup>3</sup>**.

### ii. Wastewater treatment to reduce pollution and environmental impact

In response to compliance with the different regulatory frameworks for the control of industrial environmental impacts, as well as environmental management and monitoring programs derived from monitoring measures indicated in impact studies or environmental licenses, wastewater generated by the activities of the Group companies is treated (purified). The Group has its own treatment plants in the Industrial Centers in Arteixo, Chapela and Porriño in Spain, and in PROMARISCO in Ecuador. The quality of wastewater disposed to both the public sewage system and to the natural environment, is subject to analytical control. In addition, in general, we work both on optimizing the use of water to reduce the generation of wastewater with the consequent reduction in purification related energy use and financial costs, as well as in improving the purification capacity and efficiency of this process.

Similarly, sewage and bilge water are treated on board our fishing vessels prior to their discharge.



## 2.2 Consumption and efficient use of raw materials

The responsible use of natural resources through the different steps of the value chain of our products requires all our companies to conduct a day-to-day management of raw materials regarding their origin, quantity, and quality, whether renewable or not. Raw materials identified as relevant are quantified for management purposes and for performance indicators (KPIs) reporting, and are classified as Principal (from capture fisheries and aquaculture, i.e. fish biomass, crustaceans, etc.), Auxiliary (ingredients and other materials necessary for the preparation of the finished product) and Packaging material (such as cardboard for packs and cartons, or plastics for bags, trays, retractable film, etc.).

The indicator shown below translates the investment in identified raw materials into finished products, from the different Group's activities: Fishing, in Argentina, Mozambique, Namibia and Uruguay; Aquaculture (including hatcheries, nurseries, grow out, and processing facilities), in Ecuador, Spain, Guatemala and Nicaragua; Processing and production, in France (Industrial Centers in Boulogne-Sur-Mer and Lorient), Spain (Industrial Centers in Arteixo, Catarroja, Chapela, Paterna and Porriño), Namibia and Peru.

Activity & Country	Raw material efficient consumption indicator [kg of RM/kg produced]
<b>Aquaculture</b>	
Ecuador	1.52
Spain	1.36
Guatemala	1.37
Nicaragua	2.96
<b>Fishing</b>	
Argentina	0.09
Mozambique	1.08
Namibia	0.76
Uruguay	0.08
<b>Processing</b>	
Spain	1.08
France	1.12
Namibia	1.14
Peru	1.27

## 2.3 Energy consumption, efficiency and use of renewable energies

Apart from natural resources, optimization of energy use is essential to improve the environmental performance derived from our activities, as the production of non-renewable electricity and the combustion of fossil fuels result in the emission of greenhouse gases (hereinafter GHGs) into the atmosphere. Energy used in our activities and energy efficiency indicator **in 2019** are shown below:

Source	Energy Use [MWh]
Diesel	496,204.3
Natural gas	50,654.0
Other fuels	8,088.1
Electricity	127,534.4
<b>Total</b>	<b>682,480.7</b>

Energy efficiency  
indicator  
[MWh/MT produced] 3.3

Energy efficiency indicator (energy used to produce finished products), by activity and country, in 2019, is shown in the table below:

Activity & Country	Energy efficiency indicator [MWh/MT produced]
<b>Aquaculture <sup>1</sup></b>	
Ecuador	2.2
Spain	8.9
Guatemala	4.0
Nicaragua	3.4
<b>Fishing <sup>2</sup></b>	
Argentina	5.3
Mozambique	61.6
Namibia	4.1
Uruguay	5.8
<b>Processing <sup>3</sup></b>	
Spain	1.6
France	1.4
Namibia	0.9
Perú	0.3

<sup>1</sup> This indicator depends on the farming process (intensive/extensive) and life cycle of the species reared.

<sup>2</sup> This indicator depends on the specific usage for navigation, operation, and freezing processes on board the fishing vessels. The indicator for Mozambique shows a lower catch/fishing day.

<sup>3</sup> This indicator depends on the complexity of the processing line and freezing requirements.

### 3. Circular economy and waste prevention and management

The different Group companies undertake a proper waste management of the different types of waste, in compliance with legislation in force in each country in which we are present, and international waste-related regulations. Thus, waste from our fishing fleet, aquaculture operations and processing plants is classified, segregated, and managed, we also work on the best technical solutions available in each case, by entering alliances with stakeholders or with *Approved Waste Management Bodies*. In addition, we participate, through the Green Dot system, in the IWMS (Integrated Waste Management Systems) in the countries in which we have a commercial presence.

### 3.1 Waste generated by the Nueva Pescanova Group

The Nueva Pescanova Group, in its fishing, aquaculture and processing operations classifies the waste generated by hazardousness and recovery method used. The table below shows the quantities identified in **2019**:

Recovery method	Quantity generated [tons]
Hazardous waste to Approved Waste Management Bodies	201.1
Non-hazardous waste	13,779.2
Recycled	3,671.9
Composted	2,771.9
Energy recovery	1,427.2
To Approved Waste Management Bodies	5,908.2
Recovered organic byproducts	11,104.7

Pursuant to good practices and applicable regulations, hazardous waste must be shipped to *Approved Waste Management Bodies* in charge of performing the proper waste treatment.

### 3.2 Prevention measures, recycling, and reuse of waste material

In the different countries in which we are present there are plans and programs that contribute to improve environmental management regarding prevention, recycling, and reuse of waste material.

#### i. CAMANICA (Nicaragua)

In the processing plant of the Group Company in Nicaragua (CAMANICA), we have implemented a program for Non-Hazardous Waste management, that properly manages some **2 tons of plastic** and **76 tons of cardboard and paper**, and a program for the management of Hazardous Waste (waste oil, filters and woven strings, and hydrocarbon contaminated cardboard). Both programs strengthen relationships with local players (for instance Asociación Los Pipitos and Sertrasa).

#### ii. PROMARISCO (Ecuador)

In the Group Company in Ecuador (PROMARISCO) we have implemented a program for Non-Hazardous (common and organic) Waste at the shrimp farms and the processing plant, and another program for non-recyclable (inorganic and non-biodegradable) waste. This waste is stored at the processing plant and afterwards shipped to Guayaquil for management by municipal bodies.

#### iii. NOVANAM (Namibia)

In the Group company in Namibia, NOVANAM, apart from the program for waste management in the processing plant, there is also a program for waste management on board our vessels that complies with international *MARPOL (Marine Pollution)* regulations and with Namibian port regulations, and procedures for waste and oil management.

### 3.3 Other ways for waste recovery and disposal

#### i. Circular economy solutions

To guarantee a responsible and sustainable user of marine biological resources, we encourage circular economy solutions of fisheries byproducts. We believe that the integral use of fish is essential to fulfill this purpose. Thus, we implement projects and promote alliances in those countries where we perform fishing, or seafood processing activities, to define solutions for the recovery of by-products from these activities, for the production of fishmeal and fish oil for animal feed industries. The total organic byproducts recovered in **2019** reached **11,104.7 tons**. Apart from reducing the amount of organic waste and misused valuable natural resources, these partnerships contribute, in many cases, to generating jobs and the socio-economic development of the communities in which we are present.

##### a. CAMANICA (Nicaragua)

In the processing plant of the Nicaraguan Group company, CAMANICA, shrimp organic byproducts are reused, and at the same time creating synergies with local agents. This ensures proper management of these byproducts, which would otherwise be managed as waste. These byproducts are processed into fishmeal to produce feed for other species and to create new sources of work and wealth through byproduct recovery. These circular economy practices have enabled the use of **531 tons/year of byproducts** and the creation of **18 jobs** in the local community of Chinandega (Nicaragua).

##### b. PROMARISCO (Ecuador)

In the processing plant of the Ecuadorian Group company, PROMARISCO, shrimp organic byproducts are reused by selling shrimp heads and shells to produce feed for other species. This has allowed the circularity of **341 tons/year of byproducts**.

##### c. NOVAGUATEMALA (Guatemala)

We have developed circular solutions by entering an agreement with a local pet food company that uses shrimp heads and shells (totaling **26 tons/year**).

##### d. NOVANAM (Namibia)

Our Namibian Group company, NOVANAM, sells its organic waste from its processing plants (hake skins, bones, and heads) to the *Exigrade* feed mill in Lüderitz (Namibia), processing **5,150 tons/year** to produce **100 tons/month of fishmeal**. This circular economy action brought about the employment of **30 local people**.

In addition, the building of the new wet-fish trawlers for Namibia at the Spanish shipyard ARMON is aligned with this commitment to sustainability and recovery of fishery resources. Thus, these new fishing units are equipped with tanks for the disposal of guts, so in cooperation with local entrepreneurs, we promote the use of fish heads, fish skin and bones to be processed into fishmeal for animal feed.

### 3.4 Actions to combat food waste

The fight against food waste is a priority and constant concern for a food Group of companies like ours. In 2019 we have worked and intensified agreements, operations, practices, and programs to reduce waste from/of the food we produce. The following summarizes the most relevant actions and workspaces in this field:

- i. Reduction of organic waste at our processing plants.
- ii. Prevention of food waste in our operations through the continuous improvement of demand management and stocks optimization.
- iii. Donations to non-profit entities and institutions that collect food to meet the food needs of the most disadvantaged people and groups, in precarious and/or social exclusion situations.

To regulate donations of our products and prevent their destruction, we have prepared an internal corporate standard that has been approved by our Executive Committee, *Standard Procedure for Food Donations*.

The Nueva Pescanova Group has entered agreements with the Provincial Food Bank Foundation in Vigo and the Food Bank in Madrid. This agreement is just one more of the actions that the Group actively and regularly makes every year with different social organizations in Spain. In **2019** the Nueva Pescanova Group donated **13,514 kg** of food in Spain.

- iv. Collaborative work through the associations we are members of, through their working committees (for instance, Asociación Española de Codificación Comercial –AECOC– and Clúster Alimentario de Galicia –CLUSAGA–), by being present in their sustainability committees.

## 4. Climate change

We acknowledge that the activity of our companies in the different phases of the value chain and production involves the emission of certain substances, including GHGs, which, depending on their warming potential, contribute to the greenhouse effect in the atmosphere and consequently favor climate change.

It is our duty to work to identify and quantify our environmental footprint caused by the emission of the substances for which we are responsible and, with this information, to decide responsibly the switch to more efficient processes and practices with a lower environmental impact. These change actions include improving the energy efficiency of combustion equipment and electricity usage, the preferential use of materials and products that, throughout their life cycle, generate equally fewer emissions and lower energy usage, the energy recovery of the waste we generate, the increase in the production and/or usage of renewable energy, and the reduction of losses and waste, as well as the recovery of byproducts at all stages of our chain. We determine the sources, inefficient processes and identify opportunities to improve or replace equipment or processes to achieve a reduction in usage and the corresponding GHG emission per unit of finished product.

We are currently measuring the footprint of our activities, describing our processes, and identifying opportunities to improve performance and efficiency. We are working to get a more precise picture of our profile and our operations to be able to define both the short and medium-term goals, and the most suitable strategies to achieve them, always aligned with the principles described in the *Corporate Sustainability Policy* of the Nueva Pescanova Group.



In order to strengthen our knowledge, partnerships and the ability to generate the change necessary to improve our performance, we have taken part, in 2019, of various governance initiatives and scientific platforms on environmental sustainability and climate change in the seafood sector. We often collaborate in discussion forums, working groups and industry-relevant conferences; namely:

- (i) FAO's *International Symposium on Fisheries Sustainability*;
- (ii) COP25 event on sustainable aquaculture;
- (iii) We joined the *Spanish Global Compact Network (UN Global Compact)*;
- (iv) We support the *Global Impact Initiative (GII)* commitment: *Business Ambition for 1.5° C*;
- (v) We participated in the *Seafood Stewardship Index of the World Benchmarking Alliance (WBA)*.

The incidence of climate change, especially when it involves atmospheric and ocean circulation of temperature and nutrients, may have a potential impact on the availability of commercial fisheries species and, therefore, represents a risk to our fishing activity, both by decreasing ecosystem productivity, species recruitment and growth (with impact on fishing grounds management and access to fishing quotas), and in fish distribution at different depths (with an impact on fishing effort) or geographical distribution (with impact on the access to resources and fishing rights). In both cases, the potential impacts on food safety and access to marine animal protein, as well as the political impact on the management of access to fishing grounds and resources, is considered. Similarly, the effect on productive and regenerative capabilities of coastal ecosystems and wetland areas can be anticipated and, therefore, entail risks to our extensive aquaculture activity due to the interference of the sourcing, regulation and support services existing in these ecosystems.

Increasing the efficiency of industrial processes currently emitting GHGs is an essential aspect of the Nueva Pescanova Group's environmental management and we understand it as described by the United Nations Intergovernmental Panel on Climate Change (IPCC). In the Nueva Pescanova Group we are aware that our fishing, aquaculture and processing activities require to use a significant amount of energy (electricity and fuels), we also need to use refrigerant gases in for our freezing and product preservation processes, we also take into account product transport and distribution, as well as raw materials used.

Measures to mitigate and offset our environmental footprint and adaptation to climate change advocate the focus of most of our actions aimed at improving efficiency, both in the use of energy and natural resources, as well as in the generation of emissions, waste and effluents. In this sense, we think it is important to highlight the effort that the Nueva Pescanova Group makes in technological modernization and investment in new equipment to measure, control and optimize our operations, pursuing its maximum efficiency. At the same time, we work with our people on changing habits and adopting good practices; with supply chains in the search for better technical solutions, materials and services; and with the communities where we play a relevant role, in raising awareness and direct collaboration in projects for mitigating and offsetting emissions, with a particular focus on biodiversity and the environment.

We collaborate with governments and their scientific agencies in establishing better legal and biological frameworks for marine resources and for the protection and conservation of the marine environment going from the adaptation to climate change effects, both in capture fisheries and aquaculture, in seeking how to minimize the risks that would lead to a lower availability of resources and control the access to the same.

Based on the methodology recommended by the *Greenhouse Gas Protocol* of the *World Business Council for Sustainable Development* (WBCSD) and the *World Resources Institute* (WRI), in 2019, we reported direct and indirect emissions linked to the operations of the Nueva Pescanova Group companies. Thus, emissions are classified under **Scope 1** (direct emissions) emissions resulting from the operation of fossil fuel combustion equipment owned or controlled by Group companies (both from static sources, including fugitive gas emissions from cooling and air conditioning equipment, as well as movable, like the fishing fleet and other vehicles); under **Scope 2** (indirect emissions) those linked to the generation of electricity acquired and consumed; and under **Scope 3** (indirect emissions) those caused by the shipment of raw materials and products (logistics), business trips using external means of transport and those associated with water supply:

Source of GHG Emissions	GHG Emissions [tons of CO <sub>2</sub> -eq]
<b>Scope 1</b>	
Emissions from static sources	49,502.3
Emissions from movable sources	148,658.2
Cooling and air conditioning	136,091.8
<b>Total scope 1</b>	<b>334,252.3</b>
<b>Scope 2</b>	
Electricity consumption	28,573.7
<b>Total scope 2</b>	<b>28,573.7</b>
<b>Scope 3</b>	
Business trips	3,027.7
Shipment of raw material and products	32,658.9
Water consumption	169.2
<b>Total scope 3</b>	<b>35,855.8</b>
<b>Total emissions</b>	<b>398,681.9</b>

GHG emission intensity indicator [tons CO <sub>2</sub> -eq/tons product]	1.9
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Reducing relative GHG emissions is the result of continuous efforts to optimize the environmental performance of our fishing, aquaculture, and processing operations. For this reason, we work to promote specific projects and actions in some of the countries where we are present.

#### i. Fishing fleet

Measures for reducing the use of fuel in the fishing fleet are continuously applied on all our vessels in the different countries where we operate. The objective is to reduce direct emissions (Scope 1 in the GHG Protocol) and achieve a more efficient fishing activity through the optimization of the *fish/fuel* ratio. Thus, projects such as reducing the weight of trawl nets, the optimized design of doors and winches to haul the fishing gear and the change of lighting to LED systems on board have reduced the demand for power to the engine and indirectly save fuel. These savings, along with other energy efficiency management measures (such as the design and implementation of engine and other equipment maintenance programs, the installation of particulate filters and the use of more environmentally friendly fuels), have achieved a significant improvement in the environmental sustainability of our fleet.

In this regard, we emphasize that our wet-fish and freezer fleet in Namibia has achieved a **25% reduction in annual diesel** consumption compared to the usage in 2012, as well as an equivalent reduction in annual emissions – these data correspond to a gross saving in fuel use of about 3.64 million liters per year and 10,440 tons of CO<sub>2</sub>-eq. Fuel consumption performance indicator by total catch has dropped from 0.41 to 0.32 liters of diesel/ton of fish (-20.7% from 2012 to 2019 and -6% in the last financial year alone), while fishing efficiency has risen from 14.5 to 20.1 tons of fish/fishing day in the same period (2012-2019).

#### ii. Processing Plants

With similar management principles, industrial equipment replacement and maintenance programs are identified in our plants to ensure a more efficient operation. These programs also pursue direct or indirect savings from fuel consumption and improved activity, expressed in a "fuel consumption by product quantity" indicator.

We have implemented projects that pursue savings in electricity use through proper maintenance, replacement, and optimization of the operation of industrial equipment that can increase their *Coefficient of Performance* (COP) and generate significant savings in energy use. In this regard:

- Production efficiency indicators have improved in CAMANICA (Nicaragua), from of 1.14 kWh/kg of shrimp processed in 2018 to 1.07 kWh/kg (i.e., -6%) in 2019.
- Production efficiency indicators have improved in PROMARISCO (Ecuador), from 0.77 kWh/kg of shrimp processed in 2018 to 0.72 kWh/kg (i.e., -7%) in 2019.
- Production efficiency indicators have improved in NOVAGUATEMALA (Guatemala) from 4.31 kWh/kg of shrimp processed in 2018 to 3.42 kWh/kg (i.e., -21%) in 2019.
- Production efficiency indicators have improved in the Industrial Centers in Spain from 2.17 kWh/kg of shrimp produced in 2018 to 1.59 kWh/kg (i.e., -27%) in 2019.

- Similarly, switching from previous lighting systems to LED systems represents a potential saving of electricity consumption higher than 60%. This measure is being progressively implemented in all facilities of the Nueva Pescanova Group.

Improved performance and implementation of more efficient processes have an additional positive impact on product quality, as well as increased overall efficiency of the industrial process (e.g. reduced handling or processing time, reduced thermal amplitudes, cleaner processes, etc.)

### iii. Power supply

The shift to more environmentally friendly energy sources covers several specific projects and mainly seeks to reduce indirect emissions (Scope 2 in the *GHG Protocol*). We have worked on the implementation of technical solutions suitable to the characteristics of each country, changing when possible the supplier of electricity from fossil fuels to renewable sources. Thus:

- In Ecuador (PROMARISCO), with the acquisition of electricity from a supplier that generates it from sugarcane bagasse we achieve an estimated saving of 40% in GHG emissions if compared to the use of the national electrical grid.
- At the Miramar laboratories (hatcheries) of our Group company in Nicaragua (CAMANICA), we use a solar-powered water heating system (instead of diesel), saving 112 thousand liters of diesel per year since 2009.
- For all the industrial centers and headquarters in Spain, a supplier of electricity generated by renewable sources has been chosen for 2019.
- At NOVANAM's processing plant in Lüderitz (Namibia) in December 2019 we have installed 3,132 m<sup>2</sup> photovoltaic solar park. This solar park will be extended in 2020, to reach 13,500 m<sup>2</sup>, to enable the production of approximately 317,000 kWh per month and will represent a reduction in the demand of power from the electrical grid of up to 30% and the respective CO<sub>2</sub> emissions.

## 5. Protecting biodiversity

### 5.1 Preserving and restoring biodiversity

Fishing is intrinsically the capture of commercial (economically valuable) species that, when poorly managed, can cause the depletion of populations of the targeted species and/or interfere with other species and thus threaten the balance of the marine ecosystem. For this reason, we seek to ensure that our fishing activity is always governed by the principles of a rational management of biological resources and the maintenance of the biodiversity and environmental quality necessary for the proper performance of this ecosystem on which we depend.

In this regard, as expressly stated in Article 44.5 of *Our Code of Ethics*, in the Nueva Pescanova Group we are committed to and assume the principles and standards set out in the ***Code of Conduct for Responsible Fisheries*** of the *UN Food and Agriculture Organization* (FAO), and also to the compliance and respect for international, national, regional or local regulations governing the Law of the Sea and the aquaculture activities in force in the countries where we carry out our fishing and aquaculture activities.

In our principles of responsible fishing we focus on combating illegal, unreported and unregulated (IUU) fishing; adopting selective and environmentally safe fishing gear and practices; avoid overfishing in compliance with relevant management measures; minimizing waste in the capture, handling, processing and distribution of fish and seafood products; and on participating with

governments and non-governmental organizations (NGOs) in the conservation of fishery resources and fisheries management and development.

Like we do with our fishing activity, we support aquaculture as an important source of animal protein, to reduce pressure on fishing grounds and ensure sustainable, safe, healthy, and controlled resources. Consequently, we are committed to responsible farming on our aquaculture farms to contribute positively to the preservation and long-term sustainable use of natural resources. Thus, we endorse an optimal use, to maintain availability and quality for current and future generations. Likewise, good environmental management and sustainable development are achieved, as we have adopted efficient and environmentally safe farming practices; we avoid overloading the ability of natural ecosystems to absorb waste and regenerate resources, we meet all relevant management measures and bring waste to the minimum in the rearing, handling, processing and distribution of aquaculture products.

In addition, we have strengthened our commitment to responsible fishing and aquaculture and all our fishing and aquaculture activities are certified as compliant with sustainability standards by relevant, internationally recognized certifying bodies, whose principles align with those mentioned above, or at least comply with FAO's Code of Conduct for Responsible Fisheries.

In addition, equivalent principles are adopted for our processing activities with a particular focus on performing a prior assessment of the effects of our activity and/or facilities on the diversity and integrity of ecosystems in a potentially affected environment, based on the most reliable scientific and technical information, in order to minimize harmful ecological changes and the corresponding economic or social consequences arising from the activity, use and specific emissions, including land use and occupation, and to design and implement environmental and ecological mitigation and management plans deemed necessary.

In this regard, we have implemented the principles described above in several ways:

- By the continuous improvement in the design of fishing gear used to minimize the impact on no-targeted species, the reduction of by-catch and the direct impact on the seabed, with the invaluable assistance of our expert net makers.
- By preventing by-catch and the commercialization of *Endangered, Threatened and Protected species*, in accordance with the *International Union for Conservation of Nature* (IUCN).
- Using *tori lines* which are aimed at minimizing seabird bycatch, in fact we are pioneers on the design and implementation of the use of this type of lines in the fishing grounds in Namibia.
- Sponsoring a conservation program for a sea turtle species, the *olive ridley* (*Lepidochelys olivacea*), at the initiative of CAMANICA in Nicaragua, through taking care of 114 eggs, and release sea turtle hatchlings, awareness-raising actions, and rescue campaigns.
- Sponsoring a conservation program for iguanas (*Iguana iguana*) in Guatemala at the initiative of the Group company NOVAGUATEMALA (by developing procedures for protecting wildlife at the farms, awareness raising actions and cooperation with the CEPAC school, and the release of 200 newborn iguanas in 2019) and in Nicaragua through our group company CAMANICA (with animal nurseries, cooperation with the National University and a campaign for releasing 350 newborn iguanas in 2019).



- Sponsoring programs for mangrove (*Rhizophora mangle*) reforestation, at the initiative of NOVAGUATEMALA in Guatemala, CAMANICA in Nicaragua and PROMARISCO in Ecuador, with the benefits associated to the same (building habitats and breeding grounds, reducing pollution to the environment or controlling soil erosion).
- By the installation of native plants nursery in the farms of NOVAGUATEMALA in Guatemala and CAMANICA in Nicaragua, with the aim of reforesting the environment of the farms and helping to combat soil erosion.
- Organizing and participating in clean-up campaigns of beaches, riverbanks and estuaries in Ecuador, Guatemala, Nicaragua, and Spain, thus contributing to improve the quality of the environment and recover habitats.
- Actively cooperating in awareness raising campaigns through an environmental education program in Nicaragua in schools near our farms to instruct in environmental, ecological and preservation issues. Also, the students from these schools take part in preservation campaigns (for instance the release of iguanas) and reforestation programs.

## 5.2 Potential impact on protected areas

Our business responsibility and sustainability programs pay special attention to environmental protection and conservation of the ecological characteristics and services of ecosystems that may be affected by the specific activities of the companies of the Nueva Pescanova Group.

We are committed to comply with all national and international regulations applicable to monitoring the environmental and socio-economic impact of the activities of the Group companies (design and implementation of supervising and monitoring programs in the field of different Environmental Impact Assessments (EIA) of our facilities and operations; environmental monitoring and farm management plans, by designing and promoting ecology and conservation projects; and through the conduct of complementary studies of biodiversity and environmental and social impact).

Our aquaculture activities in Nicaragua run by our Group company CAMANICA may have a potential impact on biodiversity since our shrimp farms are in an area included in the *Protected Nature Reserve of the Estero Real Delta*. Given the sensitivity of the environment in respect of biodiversity and the protection status, our aquaculture activity in this country is governed by management and responsible action plans; namely:

- Implementation of evaluation, monitoring and mitigation programs related to our aquaculture activity.
- Conservation projects designed for impact mitigation and ecosystem health improvement.
- Environmental Impact Assessments that have identified potential impact on iguanas (*Iguana iguana*) population and the potential reduction of the mangrove (*Rhizophora mangle*) coverage, Biodiversity and Participative Social Impact Assessments of our farms in the process for certification by the Aquaculture Stewardship Council (ASC).

- Participation in several projects for environmental protection and conservation to mitigate potential temporary and reversible impact in an area of 2,989.5 ha located in protected grounds.
- Sponsoring the rearing in captivity of iguanas and subsequent release into natural environment (350 individuals released in 2019) or reforestation of mangrove areas (6 ha in 2019) and endemic trees (5,000 propagules in 2019).
- Identification of positive impacts resulting from turning originally arid areas into ecologically productive areas for shrimp farming and the attraction effect on birds and mammals in search of food.

#### 6. Other pollution disclosures

Our *Materiality Matrix* for our fishing, aquaculture and processing activities has not identified any relevant noise and light pollution on the environment. Emissions into the atmosphere of ozone-depleting substances (ODS) (GRI 305-6), as well as nitrogen oxides (NOx), sulfur oxides (SOx) and other significant air emissions (GRI 305-7), are not considered relevant in respect of the Group's activities.

### IV. DISCLOSURES ON SOCIAL ISSUES AND OUR PEOPLE

#### 1. Employment

##### 1.1 Employees

Total head count of the Nueva Pescanova Group and its distribution by country and gender, as at December 31, 2019, is shown below:

Country	Female	Male	Total
Argentina	58	685	743
Brazil	2	7	9
Ecuador	456	1,438	1,894
Spain	638	522	1,160
France	105	103	208
Greece	6	10	16
Guatemala	711	168	879
Ireland	14	11	25
Italy	9	11	20
Mozambique	28	842	870
Namibia	1,316	1,039	2,355
Nicaragua	197	1,468	1,665
Peru	59	55	114
Portugal	12	18	30
South Africa	1	12	13
Uruguay	7	65	72
USA	13	11	24
<b>Total</b>	<b>3,632</b>	<b>6,465</b>	<b>10,097</b>

Total head count of the Nueva Pescanova Group and its distribution by country and age group, as at December 31, 2019, is shown below:

Country	<25 years	25-45 years	>45 years	Total
Argentina	11	466	266	743
Brazil	-	7	2	9
Ecuador	387	1,064	443	1,894
Spain	16	585	559	1,160
France	17	117	74	208
Greece	-	9	7	16
Guatemala	221	563	95	879
Ireland	-	8	17	25
Italy	2	8	10	20
Mozambique	75	496	299	870
Namibia	142	1,461	752	2,355
Nicaragua	333	1,126	206	1,665
Peru	15	77	22	114
Portugal	-	10	20	30
South Africa	-	3	10	13
Uruguay	8	42	22	72
USA	1	15	8	24
<b>Total</b>	<b>1,228</b>	<b>6,057</b>	<b>2,812</b>	<b>10,097</b>

Total head count of the Nueva Pescanova Group and its distribution by country and professional category, as at December 31, 2019, is shown below:

Country	Senior Management	Middle Management / Technicians	Qualified Staff / Blue Collar	Total
Argentina	9	132	602	743
Brazil	2	3	4	9
Ecuador	7	289	1,598	1,894
Spain	76	360	724	1,160
France	8	65	135	208
Greece	5	11	-	16
Guatemala	4	67	808	879
Ireland	1	7	17	25
Italy	4	6	10	20
Mozambique	6	200	664	870
Namibia	7	182	2,166	2,355
Nicaragua	7	148	1,510	1,665
Peru	3	30	81	114
Portugal	5	19	6	30
South Africa	1	7	5	13
Uruguay	1	15	56	72
USA	7	12	5	24
<b>Total</b>	<b>153</b>	<b>1,553</b>	<b>8,391</b>	<b>10,097</b>

## 1.2 Type of employment contract

Total head count of the Nueva Pescanova Group and its distribution by type of employment contract, as at December 31, 2019, is shown below:

Country	Full-time	Temporary	Total
Argentina	570	173	743
Brazil	8	1	9
Ecuador	1,894	-	1,894
Spain	984	176	1,160
France	158	50	208
Greece	16	-	16
Guatemala	691	188	879
Ireland	6	19	25
Italy	15	5	20
Mozambique	212	658	870
Namibia	1,061	1,294	2,355
Nicaragua	1,326	339	1,665
Peru	29	85	114
Portugal	27	3	30
South Africa	10	3	13
Uruguay	72	-	72
USA	24	-	24
<b>Total</b>	<b>7,103</b>	<b>2,994</b>	<b>10,097</b>

Total head count of the Nueva Pescanova Group and its distribution by type of employment contract by gender, age group, and professional category, as at December 31, 2019, is shown below:

Professional Category	Full-time						Temporary						Total
	Female			Male			Female			Male			
	<25	25-45	>45	<25	25-45	>45	<25	25-45	>45	<25	25-45	>45	
Senior Management	-	14	26	-	36	74	-	1	-	-	2	-	153
Middle management/Technicians	12	248	163	16	434	428	12	34	4	11	85	106	1,553
Qualified Staff / Blue Collar	137	1,077	719	600	2,202	917	179	866	140	261	1,058	235	8,391
Total	149	1,339	908	616	2,672	1,419	191	901	144	272	1,145	341	10,097

Average headcount in 2019 by full-time or temporary employment, gender, age group and professional category is shown below:

Professional Category	Full-time						Temporary						Total
	Female			Male			Female			Male			
	<25	25-45	>45	<25	25-45	>45	<25	25-45	>45	<25	25-45	>45	
Senior Management	-	13	24	-	38	76	-	1	-	-	1	-	153
Middle management/Technicians	17	250	162	23	451	448	10	31	3	9	91	116	1,611
Qualified Staff / Blue Collar	156	1,071	697	625	2,205	912	368	1,264	124	433	1,199	234	9,288
Total	173	1,334	883	648	2,694	1,436	378	1,296	127	442	1,291	350	11,052

*Part-time employees excluded. In Spain, the number of part-time employees 152, as at December 31, 2019. Part-time contracts are not considered in the collective agreements (or in industrial relations frameworks provided by local labor laws) in the other countries in which we are present.*

### 1.3 Lay-offs

The number of layoffs, by gender, age group and professional category, in 2019, is shown in the table below:

Professional Category	Female			Male		
	>25	25-45	>45	>25	25-45	>45
Senior Managers/Executives	-	-	1	-	2	6
Middle Management / Technicians	1	15	9	-	41	37
Qualified Staff / Blue Collar	54	230	39	242	348	59
<b>Total</b>	<b>55</b>	<b>245</b>	<b>49</b>	<b>242</b>	<b>391</b>	<b>102</b>

### 1.4 Average remuneration<sup>1</sup>

Average remuneration of Nueva Pescanova Group employees, as at December 31, 2019, by Cash Generating Unit (CGU), age group and professional category is shown below:

Aquaculture - Vannamei			
Professional Category	<25	25-45	>45
Senior Management	-	57,534	92,716
Middle Management / Technicians	6,367	11,277	16,706
Qualified Staff / Blue Collar	3,880	4,111	4,720
Commercial & Other			
Professional Category	<25	25-45	>45
Senior Management	-	89,838	107,197
Middle Management / Technicians	20,585	32,919	45,510
Qualified Staff / Blue Collar	14,762	19,779	25,573
Fishing - Africa			
Professional Category	<25	25-45	>45
Senior Management	-	58,711	61,820
Middle Management / Technicians	3,256	7,623	8,949
Qualified Staff / Blue Collar	2,479	2,946	3,392
Fishing - Southern Cone			
Professional Category	<25	25-45	>45
Senior Management	-	123,967	114,538
Middle Management / Technicians	7,048	17,310	28,395
Qualified Staff / Blue Collar	6,234	8,219	7,645

*For calculation purposes we have taken gross annual salaries, including night shift bonuses.*

*We have excluded fleet staff on board of fishing vessels, part-time employees hired in Spain, flexible time employees, and expats since data are not comparable to the rest of the data provided.*

<sup>1</sup> The 2018 Report on the Non-Financial Statement did not provide the average remuneration of employees for failing to have robust data reflecting the reality of the Group's remuneration policy. That is why this Report does not present the evolution of these reports.



Average remuneration of fleet staff on board Nueva Pescanova Group's fishing vessels, as at December 31, 2019, by age group and professional category, is shown below:

Professional Category	Male		
	<25	25-45	>45
Captains and Chief Engineers	-	69,616	84,074
Deck officers & 1st Engineers	11,983	45,235	60,132
Maintenance & Junior Staff	5,537	12,664	15,152

*For calculation purposes we have taken gross annual salaries, including night shift bonuses.*

*Remuneration to female workers has not been included because they are not comparable. As at December 31, 2019 the number of females on board of fishing vessels is 12, whilst males are 1,562 (a total of 1,574).*

The Nueva Pescanova Group has analyzed the competitiveness of employees' remuneration, by comparing average remunerations, at December 31, 2019, by country and gender, with National Minimum Wages (NMW) as published in each country in which it is present. Below are the indexes calculated on a 100 basis:

Cash Generating Unit / Country	Average Remuneration		Index on MW	
	Female	Male	Female	Male
Aquaculture - Vannamei				
Ecuador	6,584	6,479	149	147
Guatemala	3,870	4,793	108	134
Nicaragua	3,315	3,103	167	156
Commercial & Other				
Spain	24,754	26,438	217	232
France	25,928	29,244	140	158
Greece	21,088	23,299	270	299
Ireland	37,648	36,925	200	196
Portugal	25,183	24,851	283	280
USA	42,097	44,831	287	306
Fishing - Africa				
Mozambique	3,085	2,301	348	260
Namibia	3,308	3,606	277	303
Fishing - Southern Cone				
Argentina	10,074	12,269	341	415
Peru	5,458	5,162	186	176

*For calculation purposes we have taken gross annual salaries, including night shift bonuses, of blue-collar staff, specialists, technicians, and middle managers 1 of the Group. Only these categories are included because these are the categories that represent the largest number of employees in the Group.*

*We have excluded fleet staff on board of fishing vessels, part-time employees hired in Spain, flexible time employees, and expats since data are not comparable to the rest of the data provided.*

*We have also excluded remunerations in Group companies in Brazil, Italy, Mozambique, South Africa, and Uruguay since the information is not broken down by gender.*

*The formula used for calculating the index is: (NMW by country/MW by country of the Group's blue-collar staff, specialists, technicians, and middle managers) x100. We have only included the categories that represent the largest number of employees in the Group.*

*Source for NMWs: <https://wageindicator.org/salary>*

## 1.5 Pay gap

The Nueva Pescanova Group is committed to and ensures the prevention of any type and form of direct or indirect discrimination on the basis of gender, providing objective criteria and analytical systems for determining wages for the Group's employees, thus responding to any possible gender pay gap.

Gender pay gap percentage data in the Nueva Pescanova Group as at December 31, 2019 is shown in the table below:

CGU / Country	Pay gap
Aquaculture - Vannamei	
Ecuador	(0.8%)
Guatemala	(2.8%)
Nicaragua	2.6%
Commercial & Other	
Spain	9.4%
France	(8.0%)
Greece	5.6%
Ireland	6.1%
Portugal	1.2%
Fishing - Africa	
Namibia	(0.6%)
Fishing - Southern Cone	
Argentina	(18.3%)
Peru	(2.0%)

*The formula used for the calculation of the pay gap is: the median of the female pay less the median of the male pay divided by the median of the male pay. A positive gap means the % by which the median female pay is higher than the median of the male pay and vice versa.*

*For calculation purposes we have taken gross annual salaries, including night shift bonuses, of blue-collar staff, specialists, technicians, and middle managers 1 of the Group. Only these categories are included because these are the categories that represent the largest number of employees in the Group.*

*We have excluded fleet staff on board of fishing vessels, part-time employees hired in Spain, flexible time employees, and expats since data are not comparable to the rest of the data provided.*

*We have also excluded remunerations in Group companies in Brazil, Italy, Mozambique, South Africa, and Uruguay.*

### 1.6 Average remuneration of members of the Board of Directors and Senior Officers

Remuneration of the members of the Board of Directors and Senior officers of the Nueva Pescanova Group is detailed in Note 17.3 of the Consolidated Annual Accounts of Nueva Pescanova, S.L., and its Group Companies, for the year ended December 31, 2019.

The remuneration of members of the Board of Directors in 2019, for the performance of their duties, for attending Board meetings, allowances and other consideration as provided in the articles of association is the same regardless of the member being male or female. Senior Officers, i.e. the twelve members of the Executive Committee are all male.

### 1.7 Disconnect from work

The Nueva Pescanova Group policies on the right to disconnect from work are included in the relevant collective bargaining agreements (of the company or the sector, as the case may be) and, failing that, as set out in the labor regulations that apply in each country. In addition, "Our Code of Ethics", expressly regulates the regime of use of information and communication systems provided to employees for the performance of their work.

In Spain, after the enforcement of the Organic Law 3/2018, of December 5, on Personal Data Protection and guarantee of digital rights, the right to digital disconnection, outside legal or conventionally established working hours, for workers is recognized, in order to guarantee respect for their rest time, leave and vacation, as well as their personal and family privacy. The arrangements for the exercise of this right shall take into account the nature and object of the employment relationship, enhance the right to reconcile work and personal life and shall be subject to the provisions of collective bargaining agreements or, failing that, to what was agreed between the company and workers' representatives.

### 1.8 Disability

As at December 31, 2019, the Group has hired 125 people with a disability.

## 2. Work Organization

### 2.1 Working time

Working time is regulated in own or sectoral collective bargaining agreements or in the labor regulations of application in each country in which we are present, establishing a maximum annual working time, with established shifts, among other issues. The Group considers the irregular distribution of the day, depending on the needs of the organization of the work, and also rules the overtime, in accordance with the ceiling established in the labor laws applicable in the countries where we are present.

The Nueva Pescanova Group respects the minimum daily and weekly breaks provided for in the labor regulations of application, as well as the holidays established in the relevant work schedule.

Group's employees have the right to leave work, entitled to remuneration, for different reasons such as attending to/care of family members or the fulfillment of an inexcusable duty of a public and/or personal nature, through paid leave schemes.

## 2.2 Absenteeism

The total number of hours of absenteeism for common illness in the companies of the Nueva Pescanova Group reached 303,887 in 2019. We have not included data from Ireland, Italy, and Uruguay as this is not significant in the context of the Group.

## 2.3 Reconciliation and co-responsibility of both parents

The workers of the Nueva Pescanova Group may adapt the duration and distribution of working hours to implement their right to work-life balance, within the possibilities that the Group has at all times, provided that the weekly/annual calculation of working hours is adhered to, as the case may be, all in the terms and with the scope provided for in the collective bargaining agreements or labor regulations in force.

In addition, to the collective bargaining agreements or, where appropriate, the implementation of labor regulations, regulated paid permits such as for breastfeeding, reduction of work hours for the care of minors or a disabled person, leave to attend to personal or family circumstances, etc., which favor the reconciliation of the personal, family and work life of the Group's workers.

## 3. Health and safety

### 3.1 Health and Safety Conditions in the workplace

The Nueva Pescanova Group has a *Corporate Occupational Safety and Health Policy* applicable to the whole Group. This Corporate Policy includes the commitment of the Group's Management to strict compliance with the obligations in the field of Safety and Health at Work, in accordance with the provisions of the different national and international standards and regulations, complying in all its aspects and being subject to an audit by BUREAU VERITAS, which certifies its compliance.

The Global Human Resources (People) Office of the Nueva Pescanova Group has its own Global Occupational Health & Safety Risk Prevention and Work Environment Office, which has designed and implemented for each field of activity of the Group an *Comprehensive System for the Management of the Prevention of Occupational Health & Safety Risks* (described and structured in the *Handbook for the Management Occupational Health & Safety Risk Prevention Plan*), strictly following the legal requirements of the countries in which we are present and even going beyond them in those cases where the regulations are not as advanced as in the Spanish legislation.

Likewise, there is a *Handbook on Work Operational Procedures* that contains a total 21 Preventive Procedures duly communicated to workers, thus ensuring compliance with the activities under specific labor safety standards and ensuring basic principles of safeguarding the safety of workers.

*Safe Work Sheets* are also available for the Group's four main activities (fishing, aquaculture, processing and administration/commercial) that have been given to the Group's workers in the appropriate face-to-face training sessions.

On the other hand, *Safety Handbooks* prepared according to the activities performed by the Group set the guidelines for safe work for the employees in of the four main activities mentioned in the above paragraph.

Each Group work center keeps the following *Records*, that are reviewed on an annual, quarterly, or monthly basis, in agreement with a set schedule:

- Occupational health and safety risks.
- Action plan.
- Ergonomic analysis.
- Hygienic measurements.
- Emergency and self-protection plans.
- Health surveillance.
- Regular safety visits.
- Accident inquiries.
- Activity report.
- Annual activity plan.
- Setting annual targets.
- Health and Safety Committee meetings.
- Prevention training.
- Accidents statistics.
- Analysis of accidents costs.

Corporate Occupational Health & Safety Risk Prevention and Work Environment Office prepares, annually, its *Activities Report*, *Efficiency Reports*, and the corresponding *Statistics Data* in all the countries where the Group is present. The improvement of health and safety conditions is checked year after year in the light of the results obtained, which prove a gradual reduction of the overall accidents in the Group. Also, the *Health and Safety Committees* set up in all our work center prepare the relevant *Annual Plans* setting objectives to be met every year.

### 3.2 Occupational accidents and illnesses

#### i. Occupational accidents and rates

In 2019 there have been no deaths arising from work accidents in the Nueva Pescanova Group.

The table below shows the number of accidents by gender and the relevant accident rates of the whole headcount of the Nueva Pescanova Group in 2019:

	Female	Male	Total
Nº of work accidents	81	203	284
Incidence rate	22.28	30.21	27.43
Frequency rate	10.33	13.40	12.35
Severity rate	0.14	0.20	0.18

*Worked hours are the theoretical work ours in the collective bargaining agreements*

*Rates calculation:*

Incidence rate: number of accidents per 1,000 workers ( $n^{\circ}$  of accidents/ $n^{\circ}$  workers X 1,000).

Frequency rate: number of accidents per 1,000,000 hours worked ( $n^{\circ}$  of accidents/hours worked X 1,000,000).

Severity rate: Days lost per 1,000 hours worked (days lost due to an accident/hours worked X 1,000).



## ii. Occupational diseases

In 2019, no occupational disease has been reported in the Nueva Pescanova Group (data refers only to countries where the legislation provides for the existence of occupational diseases).

## 4. Social relationships

### 4.1 Social dialogue

Regular meetings are held with workers' representatives of the different work centers (Workers' representatives, delegates, etc.) in the countries in which the Group is present, to discuss issues related to the activities of the center; namely: work schedule; shifts; safety and health at the workplace; well-being; etc.

### 4.2 Collective bargaining agreements

The percentage of employees of the Nueva Pescanova Group covered by a collective bargaining, of the company or the sector, as at December 31, 2019 is shown below:

Country	% of employees
Argentina	83
Spain	99
France	100
Italy	100
Mozambique	100
Portugal	100
Uruguay	100

*In the rest of the countries where the Nueva Pescanova Group is present and not shown in the table above, are covered by the framework of industrial relations set out in local labor legislation.*

### 4.3 Occupational health and safety in the collective bargaining agreements

#### i. General principle

The collective bargaining agreements or the applicable labor legislation in each of the countries in which we are present include specific chapters or sections on Occupational Health and Safety, thus promoting the safety and health of workers through the implementation of measures and the development of activities necessary for the prevention of occupational risks.

#### ii. Prevention services

In order to ensure due participation in prevention, the Group facilitates the set up of Safety and Health Committees in the workplaces in the countries in which we are present, also relying on the appropriate own or third party health prevention services, as the case may be..

#### iii. Health surveillance

The Group's workers are also guaranteed regular monitoring of their health condition, based on the risks inherent in the work, by the appropriate own- or third-party health surveillance provider.

In the first months of the 2019, in Ecuador (PROMARISCO) talks on preventive measures against vector diseases of the winter season were held in collaboration with the Ministry of Public Health. Likewise, in November 2019 a Preventive Health Seminar was held, with the participation of different institutions, both public and private.

In Nicaragua (CAMANICA) health care awareness campaigns and vaccination of common diseases days were carried out.

In Guatemala (NOVAGUATEMALA) the Health Day for Diabetes Control and Detection was implemented for the staff at the Champerico processing plant, this program reached approximately 350 employees.

#### iv. Workwear and personal protective equipment

The Group's workers are provided, according to the needs of each workplace, activity, and occupation, with appropriate uniforms and work clothing for the prevention of occupational hazards to which they are exposed.

### 5. Training

#### 5.1 Training policies

The Nueva Pescanova Group is committed to the continuous improvement of its workers making training a part of its global human resources management policy; empowering training initiatives that promote their modernization and proper management; ensuring continuous training that guarantees the maintenance of people's competences while facilitating the acquisition of new skills that stimulate internal promotion; and collaboration with institutions and agencies in those Programs that complete the Group's training initiatives

The corporate document on which the Group's training actions pivot are our *Corporate Policy on Talent Management* and *General Procedure on Talent Management*. The latter, includes 4 sub-processes:

#### i. Training and learning

In order to ensure that the Nueva Pescanova Group employees are trained based on the requirements in its Strategic Plan and that serve as a reference in the ways of doing in the overall scope of the Group, the main objective of the training and learning process is to make available to employees a training plan adapted to existing training needs, contributing to the development and growth of the professionals who are part of the Group at all times.

The detection of training needs is carried out annually, in October. To do this, the HR Managers of the different Business Divisions of the Group proceed, in coordination with the different Managers (people who have the responsibility to lead others), to define what are the needs to be covered in the next year. Compulsory training (i.e. the one marked by the legislation of each country) must necessarily be included within the training needs. In addition, there is also the possibility to include training actions derived from the employee's annual assessment process through the *SAP Success Factors* tool.

Based on the information gathered in the detection of training needs, HR Managers proceed to establish the priority of these needs and, if deemed appropriate, include additional training necessary to meet the objectives of the relevant Business Division. Based on the above a budget for training is prepared and sent to the Talent Development and Management Office to prepare the relevant *Annual Training Plan*.

For the training to reach all the employees of the Nueva Pescanova Group in the different countries and centers, in 2019, we launched the online training tool "Campus Nueva Pescanova". This process has been sequentially implemented, starting with the Back Office in Chapela, Madrid and the centers in Ecuador and following with Industrial Center in Chapela and the Centers in Nicaragua and Argentina, at present 681 people can access the tool.

## ii. Internal promotion

To provide greater transparency to the processes of promotion and appointments within the Group and establish validation criteria and circuits that ensure equal opportunities, the absence of any type of discrimination and, ultimately, the objectivity and impartiality in talent management, the Nueva Pescanova Group has implemented an internal process based on professional merits, the degree of compliance with performance objectives and competencies of the professionals of the Group.

## iii. Performance assessment

To guarantee continuous training that ensures the maintenance of the competences of the Group's professionals, we have an annual performance assessment process of professionals based on two fundamental criteria: the degree of fulfillment of the objectives established and the skills required of each of the positions.

## iv. Succession

The Nueva Pescanova Group has established a succession process within the organization whose purpose is to train and prepare the best possible talent to occupy positions of responsibility that are fundamental to the permanence, retention, sustainability and good development of the Group.

## 5.2 Training hours

The table below shows the total number of training hours received by professionals in all Nueva Pescanova Group companies, by category, in 2019:

Professional category	Training hours
Senior management	4,300
Middle management/Technicians	26,553
Qualified Staff / Blue Collar	34,502
Total	65,354

## 6. Equality

### 6.1 Promoting equal treatment and opportunity for women and men

Both *Our Code of Ethics* (article 13) and *Our Providers' Ethical and Social Charter* (article 5.7) expressly include the principles on non-discrimination and equal opportunity for women and men.

Similarly, our *Corporate Policy on Talent Management* is based on the establishment of equal opportunity and treatment regardless of gender, race, religion, disability, marital status, sexual orientation, family situation, age, or any other condition (Article 4.d). Also, our *Corporate Policy on Recruitment, Selection, Onboarding and Offboarding* of professionals of the Group includes, among the basic values and principles of action in this field, the principles of non-discrimination (Article 3(a)) and equal opportunity (Article 3(b)).

In addition, article 5.4 of our *Corporate Policy for the Prevention of Criminal Risks* ("Defense of fair labor relations") reflects the Group's commitment to the rejection of any form of employment discrimination on the basis of ideology, religion, beliefs, membership of an ethnicity, race or nation, gender, sexual orientation, family situation, illness or disability, for holding the legal or union representation of workers, by kinship with other professionals of the Group or by the use of official languages in each of the countries where we operate.

On the other hand, collective bargaining agreements and/or labor regulations in the countries where we operate establish the general principle of promoting equality between women and men, a commitment to equal treatment and opportunity in the workplace, as well as to the adoption of measures aimed at preventing any type of labor discrimination between men and women.

### 6.2 Equality plans

In the work centers in Spain, which are subject to Collective Bargaining Agreements, an *Equal Opportunities Committee* has been set up with the aim of analyzing, designing, and developing the Equality Plans of the Nueva Pescanova Group companies in Spain. This Equality Committee is preparing the Equality Plans which will contain an analysis of the initial situation, a program with specific measures necessary to address the gaps identified and a monitoring and evaluation procedure that will include the indicators necessary to assess the degree of compliance with the actions of the Equality Plans. Once these work has been completed and the appropriate Equality Plans have been drawn up, a Monitoring Committee will be set up to ensure the principle of equality and non-discrimination in the Group, carrying out surveillance, control and monitoring of the commitments made and how many actions are taken to meet the main objective of the Committee, i.e. the integration of the principles of effective equality between women and men and non-discrimination.

The negotiation of the Equality Plans of the companies of the Nueva Pescanova Group in Spain, is in the phase of proposal of measures whose priority objective is the integration of the gender perspective in the Policies and Plans of the Group in the different areas in which the actions to be developed are divided: selection; hiring; professional classification; training; professional promotion; remuneration; reconciliation and co-responsibility; under-representation; mobbing sexual and gender harassment and/or discrimination; gender related violence; company culture; communication and awareness-raising; occupational health and safety.

### 6.3 Measures adopted to stimulate employment

The Nueva Pescanova Group has adopted certain measures to stimulate employment, such as:

- Participation in job fairs and other events organized by universities and training centers in the different countries where the Group performs its activity, which are intended to connect students and recent graduates with companies.
- Recruitment of trainee students to encourage the insertion of young people into the labor market.
- The Group's commitment to bring down to the minimum temporary hiring through Temporary Work Agencies and, only use it exceptionally in search for a new recruitment model in which employment stability is the ultimate objective, as set out in the collective bargaining agreements and/or applicable labor regulations in the countries where we are present.
- In Nicaragua (CAMANICA) we visit local communities with little or no economic activity or sources of employment to establish contact with its people to let them know the economic activity of the Group, as well as the labor benefits of belonging to it. Likewise, agreements are entered with universities, pursuant to which we welcome the best students, in terms of their academic performance, who are given the opportunity of internships in different areas, and in turn serve as pools for the recruitment of new talent for the company..
- In Ecuador (PROMARISCO) we implemented a *Trainee Program*, which aimed to capture, develop, and attract new talent. It is a recruitment, selection and training program aimed at young professionals recently graduated in Aquaculture, Agronomy, Fisheries and Environmental studies, where the opportunity to work and rotate through the different departments in PROMARISCO shrimp farms is provided over a 6-month period. They receive constant training, face challenges and various responsibilities, so that at the end of the process, those who successfully finish the program can take a position in the Company. In 2019, 5 trainees took part in this program, and when concluded, 3 of them were hired.
- In Guatemala (NOVAGUATEMALA) we shared our recruitment plans with the people in villages surrounding Champerico, where the processing plant is located. Likewise, the Company participated in the Job Fair promoted by the Delegation of the Department Labor in Retalhuleu. Mass media, radio, television, and banners were used for these events.

### 6.4 Preventing sexual and gender harassment

Article 12.3 of *Our Code of Ethics*, states that the Group rejects all manifestations of violence, harassment at work, physical, sexual, mental, moral or any other types of abuse, abuse of authority and all other conduct that creates an intimidating, humiliating or offensive environment for Group's employees.

Similarly, *Our Providers' Ethical and Social Charter* provides, in article 5.2, that the providers of the Nueva Pescanova Group will not allow in their organization any form of harassment, abuse of authority or intimidation, humiliation or offensive treatment to the personal rights of their employees and collaborators.

Our *Corporate Policy for the Prevention of Criminal Risks* provides, in article 4.1, that the Nueva Pescanova Group rejects violence and will punish any manifestations of physical or verbal violence, threats, coercion or extortion, workplace, sexual, psychological or moral harassment, abuse of authority in the workplace and any other conducts that create a disturbing or offensive environment for the physical or moral integrity of its professionals or other third parties with which the Group interacts.

In the collective bargaining (where they exist) and applicable labor regulations include a ban on any type of harassment.

Additionally, as already mentioned in this Report, in Spain we are preparing Equality Plans, which among other issues include a Protocol for the prevention and treatment of moral, labor, sexual and gender harassment in the workplace. This Protocol establishes a commitment to providing information, prevention, mediation and suppression of conduct in the field of harassment at work, as well as the establishment of an internal, summary procedure with all confidentiality guarantees that the matter requires, in order to channel the complaints that may occur and promote its solution within the Group, seeking as main objectives:

- The commitment to an environment free of sexual or gender harassment, by implementing appropriate conditions so that reporting procedures are known to all employees and the process is carried out with the maximum guarantees for all parties involved.
- The prevention of behaviors leading to sexual or gender harassment, by training people in the prevention of this type of situations.

In 2019, the above-mentioned *Protocol of Action in the field of Mobbing, Sexual and/or Gender Harassment and Discrimination of Pescanova España, S.L.U.* was approved and included in the above-mentioned Equality Plans. Under this Protocol, the company has set up a Harassment Committee (consisting of three people representing the company, and two representing employees) which is primarily intended to receive, investigate and resolve any Harassment Complaints that may occur, in accordance with the rules of procedure contained in this Protocol of Action.

Likewise, our Portuguese Group company (PESCANOVA PORTUGAL LTDA.) has a *Code of Good Conduct for the Prevention and Combating Harassment at Work*, where, among other content, an internal procedure for reporting and investigating any form of harassment at work is described.

Similarly, NOVAGUATEMALA has a specific internal procedure regarding non-discrimination and harassment at work which also describes how to proceed if a professional of the Group knows or is the victim of an episode of this nature.



## 6.5 Universal access for people with a disability

In Spain, the Nueva Pescanova Group has entered a cooperation agreement with Asociación *Down Vigo* to promote the employability of people with Down Syndrome or intellectual disability to promote the integration of these people into society.

In our Ecuadorian Group company (PROMARISCO), with the aim of achieving better communication with hearing impaired staff and facilitating their inclusion in the labor market, sign language training has been provided to 14 workers with a 40% to 70% hearing loss as well as to another 16 employees, co-workers and managers.

Likewise, in our Nicaraguan Group company (CAMANICA), notices have been posted in health centers, schools and in the offices of the Ministry of Labor, with the aim of promoting internal vacancies for people with different capacities.

## 6.6 Fight against discrimination and diversity management

*Our Code of Ethics* reflects respect for people as a basic fundamental principle in labor relations, which promotes a respectful working environment to achieve a positive working climate, as well as the rejection of any type of conduct or behavior that could encourage discrimination, as already stated in preceding sections of this Chapter.

# V. INFORMATION OF RESPECT FOR HUMAN RIGHTS

## 1. Introduction

As stated in *Our Code of Ethics*, the Nueva Pescanova Group is committed and linked to human and labor rights recognized in national and international law and to the principles on which the *UN Global Compact* is based, which derive from statements by the United Nations on human rights, environmental and anti-corruption issues; the United Nations Norms on the Responsibilities of Transnational Corporations and Other Business Enterprises with Regard to Human Rights; the OECD Guidelines for Multinational Enterprises; as well as other documents that may replace or supplement those referred to above.

In this regard, as already mentioned in this Report, the Nueva Pescanova Group (through its parent company Nueva Pescanova, S.L.) has joined the 2019 the *UN Global Compact* and the *Spanish Global Compact Network*.

## 2. Domestic policies

Numerous normative documents of our *Corporate Governance and Compliance Regulatory System* show the principles of action and standards of conduct in relation to respect for internationally recognized human and labor rights, in particular as regards to **freedom of association**, the **right to collective bargaining**, the **elimination of discrimination** in employment and occupation, the **elimination of any form of forced or compulsory labor**, as well as the **effective abolition of child labor**, as set out below:

- ***Our Code of Ethics*** (article 10. “Commitment to human and labor rights”; article 12. “Respect for people”; and article 13. “Principles of non-discrimination and equal opportunity”).
- ***Our Providers’ Ethical and Social Charter*** (article 5. “Commitment to the internationally recognized basic human and labor rights”).
- ***Corporate Policy for the Prevention of Criminal Risks*** (article 5. “Defense of fair labor relations”).
- ***Program for the Prevention of Criminal Risks in the Nueva Pescanova Group in Spain:***  
Crimes related to violation of human and labor rights (i.e.: imposition of harmful working or social security conditions; illegal employment of immigrant or minors; illegal labor trafficking; fraudulent emigration; labor discrimination; illegal limitation of freedom of association and the right to strike; omission of security and hygiene measures; and illegal or irregular immigration of foreigners) are duly assessed in the ***Criminal Risks and Controls Matrix***<sup>2</sup> of the Criminal Risk Prevention Program, having implemented both general and specific controls of surveillance and control for their prevention, detection and/or correction.
- ***Corporate Policy on Corporate Social Responsibility*** (articles 5. “People”; and 7. “Communities”).
- ***Sectoral Policy on Responsible Aquaculture*** (article 3. “General principles and objectives for responsible aquaculture practices”; and article 4. “Specific measures for responsible aquaculture practices”).
- ***Sectoral Policy on Responsible Capture Fisheries*** (article 3. “General principles and objectives for responsible capture fisheries practices”; article 4. “Specific measures for responsible capture fisheries practices”; and article 6. “Guidelines of Responsible Conduct for Fishing Vessels”).
- ***Corporate Policy on cooperation and Development Aid*** (article 4. “fields of action and projects for cooperation and development aid”).
- ***Corporate Policy on Corporate Volunteering*** (article 3. “Corporate volunteering in the Nueva Pescanova Group”; and article 4. “Scope and reporting principles of corporate volunteering of the Nueva Pescanova Group”).
- ***Corporate Policy on Corporate Institutional Relationships*** (article 4. “Commitments in Institutional Relations with our stakeholders”; article 5. “Operating principles in institutional relationships of the Nueva Pescanova Group with authorities and public officers”).
- ***Corporate Policy on Talent Management*** (article 4. “Operating values and principles”).
- ***Corporate Policy on Recruitment, Selection, Onboarding and Offboarding*** (article 3. “Basic operating values and principles related to recruitment, selection, onboarding and offboarding professionals in the Nueva Pescanova Group”).

### 3. Due diligence and precautionary procedures

#### 3.1 Training and awareness raising

In 2019 the Chief Compliance Officer has conducted several face to face training sessions with different professionals of the Nueva Pescanova Group both in Spain and abroad (from the members of the Board of Directors, senior officer to the lowest professional categories).

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<sup>2</sup> The Criminal Risks and Controls Matrix classifies controls as follows: “Control Description”; “Evidence”; “Person Responsible for the Control”; “Control Classification” and “Type of Control”

At those training sessions, approximately 2 hours each, different modules are devoted to human rights issues (i.e.: rejection and absolute prohibition of any form of child labor and forced or compulsory labor; protection of labor and social security rights; respect for the exercise of the rights of association, syndication, collective bargaining and strike; protection and defense of ethnic minorities and indigenous people; protection and promotion of occupational safety and health; safeguarding physical and moral integrity and indemnity; promoting equal opportunities for men and women; and seeking adequate reconciliation of work and family life).

In 2019, these face-to-face training sessions given by the Chief Compliance Officer in Group companies were attended by a total of **351 professionals**, over a total of **48 training hours**.

In addition to these face-to-face training sessions, the Group's e-Learning platform ("*Campus Nueva Pescanova*") there is a specific section called "*Nueva Pescanova Group Compliance Academy*" in which it is hosted a mandatory training course titled "Our Code of Ethics and other standards of our Internal Regulatory System" with an estimated duration of 1 hour. This online course specifically deals with the principles and behavior standards in the field of "Human and Labor Rights" followed by the Group. At the end of the course, users must pass an exam. In 2019, **211 users** of the Nueva Pescanova Campus have completed and passed this course worldwide.

### 3.2 Notices and Corporate Intranet *PESCANET*

Whenever a corporate body approves a new corporate rule, this is communicated to the organization, via an e-mail from the owner of the standard containing a brief description of its content in Spanish and English and attaching the wording of the standard in Spanish, English, French and Portuguese.

Similarly, the standards that make up the Group's Regulatory System of Corporate Governance and Compliance are hosted under the "**COMPLIANCE**" tab of the Corporate Intranet *PESCANET* in its different versions and languages (Spanish, English, French and Portuguese). The "**COMPLIANCE**" tab is, in turn, subdivided into the following regulatory categories serving as a centralized repository of our internal standards: "Compliance Channel", "Governance Standards", "Ethics and Compliance", "Corporate Policies", "Internal Standards", "Personal Data Protection" and "Prevention of Criminal Risk".

In 2019, through the e-mail account ([unidad.cumplimiento@nuevapescanova.com](mailto:unidad.cumplimiento@nuevapescanova.com)) the Compliance Unit sent two notices dated March 29, and November 8, regarding the approval of amendments to the Criminal Risk Prevention Program, as a consequence of: **(i)** the reform of the Spanish Criminal Code pursuant to Organic Law 1/2019, regarding the incorporation into the catalogue of offenses that can be committed by legal entities, the misappropriation of public funds, a slight amendment to corruption in business to punish also to those who accept an offer or promise to obtain an unjustified benefit or advantage of any kind from a third party to unduly favor business relationships; and **(ii)** The incorporation of new control activities linked to our criminal risks arising from the Corporate Policies and other Internal Standards approved in the last months since the approval of the previous version in March 2019.

### 3.3 "Compliance Visits"

In the Nueva Pescanova Group we call "**COMPLIANCE VISITS**" the Compliance inspections of Group companies abroad, carried out by the Chief Compliance Officer, who performs, among other corporate tasks, Compliance Audits, as well as face-to-face training sessions on "Our Code

of Ethics” and other “Standards of our Corporate Governance and Compliance Regulatory System” for employees.

In 2019, the Compliance Unit has made the following Compliance Visits to foreign Group companies: PESCAMAR (Beira, Mozambique, May 28-31, 2019; and NOVANAM (Walvis Bay and Lüderitz, Namibia, June 1-7, 2019). Also, in 2019, the Chief Compliance Officer followed up the Instructions/Recommendations made to foreign Group companies during the visits carried out in the previous two years (PESCANOVA ITALIA, EIRANOVA, PESCANOVA HELLAS, PESCANOVA PORTUGAL, ARGENOVA, BELNOVA, NOVAPERÚ, NOVAGUATEMALA, CAMANICA and PROMARISCO).

### 3.4 Annual Responsible Statements on Compliance

Annually, the members of the Board of Directors and certain professionals of the Nueva Pescanova Group subscribe a *Responsible Statement on Compliance with Our Code of Ethics and the Standards of our Corporate Governance and Compliance Regulatory System*, by which they take on, among other, commitments that expressly and specifically relate to human rights; namely:

- In 2019, the members of the Board of Directors of Nueva Pescanova, S.L., subscribed and signed a document titled “*Annual Responsible Statement of Personal Notification, Acceptance and Compliance with our Code of Ethics and with the performance of office and conflict of interest situations*”.
- In 2019, the members of the Executive Committee and the members of the Steering Committee of the Nueva Pescanova Group, subscribed and signed a document titled “*Annual Responsible Statement of Personal Notification, Acceptance and Compliance with our Code of Ethics, our Corporate Policy on the Prevention of Criminal Risks and the rest of the standards in Corporate Governance and Compliance Regulatory System*”.
- Additionally, the professionals of the Nueva Pescanova Group, both in Spain and abroad, that are directors of the Group companies, attorneys-in-fact, persons authorized and/or with signature or electronic certificate or access to online bank accounts, as well as any other employee in key positions and/or responsible for managing teams, also subscribe the same document “*Annual Responsible Statement of Personal Notification, Acceptance and Compliance with our Code of Ethics, our Corporate Policy on the Prevention of Criminal Risks and the rest of the standards in Corporate Governance and Compliance Regulatory System*”. The **number of professionals** of the Nueva Pescanova Group who signed this document were **166 in Spain** and **130 professionals in foreign Group companies**.

### 3.5 Document of Acknowledgment of Receipt and Acceptance of the Decalogue of Our Code of Ethics

Any new entrant to the Nueva Pescanova Group subscribes and signs at the time of hiring a document titled "*Document of Acknowledgement of Receipt and Acceptance of the Decalogue of Our Code of Ethics*". This Decalogue contains 7 standards of conduct regarding "*Labor and Human Rights*". In 2019, **1,205 professionals** have subscribed this "*Document of Acknowledgement of Receipt and Acceptance of the Decalogue of Our Code of Ethics*".

### 3.6 Responsible Statement of Our Providers' Ethical and Social Charter

All Providers of the Nueva Pescanova Group (including providers, suppliers, or temporary employment agencies) shall subscribe the *Responsible Statement* attached to *Our Providers' Ethical and Social Charter*.

By signing the said responsible declaration, a provider expressly and without reserves accepts *Our Providers' Ethical and Social Charter* (and, therefore, the standards of conduct and prohibitions provided in article 5 regarding "*commitment to the internationally recognized basic human and labor rights*") and confirms, among other things, that neither the individual signing it (as legal representative) nor the company he/she represents, nor its directors or legal representatives, have been sentenced by final judgment for committing crimes, related to, among other, human trafficking, prostitution, sexual exploitation, corruption of minors, illegal trafficking of labor, immigration fraud, promoting or inciting hate, hostility, discrimination or violence against other people.

In 2019, a total of **734 Providers** worldwide have subscribed the *Responsible Statement* attached to the *Providers' Ethical and Social Charter of the Nueva Pescanova Group*.

### 3.7 Compliance channel

The Nueva Pescanova Group makes available to all its professionals anywhere in the world its "*Compliance Channel*", whose operation is governed by the *Regulations* and *Privacy Policy of the Compliance Channel*. Consultations or allegations of non-compliance (confidentially, with all guarantees and without fear of retaliation) can be brought before the Compliance Channel. In 2019, of the 29 Consultation Files and 3 Complaint Files processed by the Compliance Unit, none have dealt with possible human rights violations.

### 3.8 Providers' ethical channel

Pursuant to article 15 of *Our Providers' Ethical and Social Charter*, the Providers of the Nueva Pescanova Group (and third parties that participated in tenders for services or supplies to be Providers of the Nueva Pescanova Group) are entitled to make Inquiries and submit Non-Compliance Claims for behaviors that are contrary to Our Provider's Ethical and Social Charter (among which are behaviors contrary to article 5 regarding internationally recognized basic human and labor rights) by a professional at the Nueva Pescanova Group, or other by another Provider through the Providers' Ethical Channel ([canal.etico.proveedor@nuevapescanova.com](mailto:canal.etico.proveedor@nuevapescanova.com)), that is managed by the Chief Compliance Officer. In 2019, no complaints of possible human rights violations have been raised through the Providers' Ethical Channel.



## VI. INFORMATION REGARDING FIGHT AGAINST CORRUPTION, BRIBERY AND MONEY LAUNDERING

### 1. Introduction

The Nueva Pescanova Group strongly rejects any type or form of corruption and maintains a zero-tolerance policy against all kinds of corrupt behavior, conduct or practice in both the public and private sectors. Similarly, the Group is firmly committed to the prevention of corporate criminal risks and, in particular, to the non-conduct of practices that may be considered irregular in the development of its relations with its stakeholders, including those relating to money laundering and the financing of terrorism.

### 2. Internal Policies

Various components of our Corporate Governance and Compliance Regulatory System demonstrate these commitments and reflect corporate measures for the prevention of any form of corruption, bribery, and money laundering, as stated below:

- **Our Code of Ethics** (articles 20. "Gifts and hospitality"; 21. "Conflicts of interest"; 39. "Relations with the public sector and political parties"; 40. "Donations and social activities"; y 41. "Corporate crime prevention").
- **Our Providers' Ethical and Social Charter** (article 7. "Honesty and integrity in the company's activities").
- **Corporate Policy on the Prevention of Criminal Risks** (articles 9. "Fishgt against corruption in the public and private sectors"; and 10. "Prevention of money laundering and financing terrorism").
- **Anticorruption Code of the Nueva Pescanova Group** (article 3. "Gifts and invitations"; article 4. "Conflicts of interest"; article 5. "Use of intermediaries or consultants"; article 6. "Relations with public authorities and officials"; article 7. "Participation in political and/or public matters"; article 8. "Solidarity, Charitable and Sponsorship Actions"; article 9. "Truthful, fair and transparent financial and non-financial information"; article 10. "The alarm signals of corruption and its diligent management").
- **Criminal Risks Prevention program:**

Corruption and bribery offences (corruption between individuals and in international economic activities, bribery, influence trafficking and misappropriation of public funds), as well as those relating to money laundering and financing terrorism, are properly assessed in the **Criminal Risks and Controls Matrix<sup>3</sup>** in the Criminal Risk Prevention Program, having implemented both general and specific controls of surveillance and control for their prevention, and/or correction.

- **Integrity Program Manual of ARGENOVA, S.A.:**

It establishes the model of organization, prevention, management and control of Integrity Risks (regarding corruption related to Public Bodies) of the company of the Nueva Pescanova Group in Argentina, in accordance with and under the requirements of Law No. 27,401 Criminal Liability of Legal Persons of the Argentine Republic and aligning the Corporate Compliance System at the Group level and the Company's internal rules at local level with the

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<sup>3</sup> The Criminal Risks and Controls Matrix classifies controls as follows: "Control Description"; "Evidence"; "Person Responsible for the Control"; "Control Classification" and "Type of Control"



provisions of Articles 22 ("Integrity Programs") and 23 ("Integrity Program Contents") of Law No. 27,401.

- **Corporate Policy on Procurement** (article 3. "Operational standards and principles in procurement").
- **Corporate Policy on Travelling and Representation Expenses** (article 4. "General principles on travelling and representation expenses").
- **Corporate Policy on Institutional Relations** (article 4. "The Commitments in Institutional Relations with our Stakeholders"; and article 5. "Action principles in the institutional relations of the Nueva Pescanova Group with public authorities and officials").
- **Action Protocol for Food Donations** (article 3. "Exclusions to the implementation of this Action Protocol and prohibitions").

### 3. Due diligence and precautionary procedures

#### 3.1 Training and awareness raising

In 2019 the Chief Compliance Officer has conducted several face to face training sessions with different professionals of the Nueva Pescanova Group both in Spain and abroad (from the members of the Board of Directors, senior officer to the lowest professional categories), that include a specific part regarding prevention of public and private corruption, bribery, money laundering and financing terrorism, with regard to the analysis of the standards of conduct, principles of action and prohibitions contained in certain internal policies of our **Corporate Governance and Compliance Regulatory System** with an impact on this matter.

As mentioned in section 3.1 of Chapter V of this Report, these face-to-face training sessions given by the Chief Compliance Officer were attended by **351 professionals**, over a total of **48 training hours**.

In addition, as mentioned in section 3.1 *in fine* of Chapter V of this Report, the Group's e-Learning platform ("Campus Nueva Pescanova") in the specific section called "Nueva Pescanova Group Compliance Academy" in which it is hosted a mandatory training course titled "Our Code of Ethics and other standards of our Internal Regulatory System". This online course specifically deals with the principles and behavior standards in the field of "**Integrity – Fight against Public and Private Corruption**". At the end of the course, users must pass an exam. In 2019, **211 users** of the Nueva Pescanova Campus have completed and passed this course worldwide.

#### 3.2 Notices, Corporate Intranet PESCANET, and awareness raising campaigns

In addition to paragraph 3.2 of Chapter V of this Report, specifically and consistently, the Compliance Unit sent two notices, dated November 8 and December 9, 2019, attaching an informative note in Spanish and English regarding the "2019 Christmas Campaign – Notice regarding gifts and hospitality" summarizing the standards of conduct for preventing public and private Corruption<sup>4</sup>.

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<sup>4</sup> In this sense, it should be noted that gifts received during the Christmas season in the different work centers of the Nueva Pescanova Group are deposited in the Human Resources office and subsequently are raffled off to the employees of these centers in the appropriate "Christmas Cocktail" or similar event held on the occasion of the Christmas holidays.

### 3.3 “Compliance Visits”

As described in section 3.3 of Chapter V of this Report, Compliance inspections performed by the Chief Compliance Officer to Group companies abroad are called **“COMPLIANCE VISITS”**, during which face-to-face training sessions are given, including, expressly, the dispositions in our *Corporate Governance and Compliance Regulatory System*, regarding prevention of corruption, bribery and money laundering.

In 2019 the Compliance Unit has performed the Compliance Visits to foreign Group companies indicated in section 3.3 of Chapter V of this Report.

### 3.4 Annual Responsible Statements on Compliance

As mentioned in the section regarding respect for human rights (Section 3.4 of Chapter V of this Report), every year, the members of the Board of Directors, members of the Executive Committee and members of the Steering Committee of the Nueva Pescanova Group as well as certain professionals of the Group subscribe the *“Annual Responsible Statement regarding compliance with Our Code of Ethics, our Corporate Policy on the Prevention of Criminal Risks and the rest of the standards in Corporate Governance and Compliance Regulatory System”*, in which among other things, they take on commitments regarding the prevention of public and private corruption, money laundering and financing terrorism.

### 3.5 Document of Acknowledgment of Receipt and Acceptance of the Decalogue of Our Code of Ethics

The Decalogue of *Our Code of Ethics* that is subscribed by new hires of the Nueva Pescanova Group there are 8 standards of conduct that expressly refer to “Integrity” and “Transparency and Honesty”. In 2019, the *“Document of Acknowledgement of Receipt and Acceptance of the Decalogue of Our Code of Ethics”* has been subscribed and signed by a total of **1,205 professionals** of the Nueva Pescanova Group worldwide<sup>5</sup>

### 3.6 Responsible Statement of Our Providers’ Ethical and Social Charter

Upon signing the *Responsible Statement* accepting the *Providers’ Ethical and Social Charter of the Nueva Pescanova Group*, it is confirmed, among other things, that neither the individual signing it (as legal representative) nor the company he/she represents, nor its directors or legal representatives, have been sentenced by final judgment for committing crimes, related to, among other, public or private corruption, money laundering, and financing terrorism. Similarly, the said *Responsible Statement* includes an express statement on the concurrence or non-concurrence of potential situations of conflict of interest with the Nueva Pescanova Group and its professionals.

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<sup>5</sup> In relation to this quantitative data, it must be borne in mind that there are professionals of the Group (especially in our Vannamei shrimp farms) who are hired on an casual, temporary or harvest basis, and every time they sign a new employment contract they must re-sign the *“Document of Acknowledgement of Receipt and Acceptance of the Decalogue of Our Code of Ethics”*, this means that there may be professionals who subscribe and sign it several times in the same calendar or financial year.

As mentioned in the consecutive section 3.6 of Chapter V of this Report, in 2019, **734 providers** worldwide have subscribed the *Responsible Statement of Our Providers' Ethical and Social Charter*.

### 3.7 Compliance channel

In 2019, of the 29 Consultation Files and 3 Complaint Files processed by the Compliance Unit, none have dealt with possible breaches of internal regulations regarding prevention of corruption, bribery, money laundering, or financing terrorism.

### 3.8 Providers' ethical channel

In 2019, no complaints about possible irregular behavior regarding prevention of corruption, bribery, money laundering or financing terrorism in the terms provided in articles 6 and 7 of Our Providers' Ethical and Social Charter were processed through the Providers' Ethical Channel.

## 4. Contributions to associations, foundations, and non-profit entities (NGOs)

In 2019, The Nueva Pescanova Group has made contributions to associations, foundations and non-profit entities amounting to **588,584,33 euros**.

## VII. **INFORMATION ON THE COMPANY AND OTHER STAKEHOLDERS**

### 1. Introduction

In 2019, as already mentioned in section 4, Chapter II of this Report, the Global Corporate Social Responsibility and Institutional Relations (CSR&IR) Office of the Nueva Pescanova Group has drawn up its *Corporate Policy on Institutional Relations*, which was approved by the Board of Directors of Nueva Pescanova, S.L. at the meeting held on March 27, 2019.

This Corporate Policy includes the identification and detail of our **key stakeholders** and our channels for communication with them, setting a Corporate Registry of Institutional Relations, that is reported to the Board of Directors through the *Corporate Governance and Responsibility Committee*. These are the specific stakeholders that have been identified: Public Bodies; Ruling and Supervising Organisms, Partners, Academy and Research; Non-Governmental Organizations, Employees, Providers and Suppliers; Customers, Consumers, Competitors, Environmental Agencies, Mass Media, Associations and Local Communities and the Society at large.

### 2. Sustainable development

#### 2.1 Local employment and development

The personal and professional development of the *People* who make up the Nueva Pescanova Group and the contribution to improve the quality of life of the *Communities* in which we are present are an essential part of the strategy of the *CSR Master Plan* of the Nueva Pescanova Group.

Our capture fisheries activities in Africa and Latin America and in shrimp farming operations in Latin America stimulates the creation of jobs and local development, favoring training in the fishing, farming, and processing of seafood products as well as the development of local economy.

The Group generates 85.3% of its employment in Africa and Latin America, where it develops projects that are part of the material aspects relevant to our Group. Thus, in the *People* pillar of our *CSR Master Plan* we are committed to promoting the professional and personal development of our people, enhancing their talent and professional career, as well as with labor responsibility ensuring compliance with the labor legislation in each country. In the *Communities* pillar of our *CSR Master Plan* we promote the creation of jobs through knowledge and technology transfer, spearheading social development projects and investing in assets and infrastructures that improve living conditions in the local communities in which we are present.

The table below shows the breakdown of the employees by Cash Generating Unit of Nueva Pescanova Group:

CGU	Female	Male	Total
Africa	1,345	1,893	3,238
Central and South America	1,490	3,886	5,376
Europe and USA	797	686	1,483
Total	3,632	6,465	10,097

In 2019 we have continued with literacy and basic general education programs in countries such as Ecuador and Namibia, which enable a better level of individual education among the Group's workers and a better organization as a team, 62 employees enrolled with the *Namibian College of Open Learning* (Namcol) and with Ecuador's educational programs in 2016-2019 period.

There are also strategic objective of our *CSR Master Plan* the permanent dialogue with our employees favoring, through periodical performance assessment (ABACO Program, through the *SAP Success Factors* tool), the professional and personal development by improving their knowledge and skills assisting them in taking on greater responsibility. As at December 31, 2019 a total of 1,210 Group's employees were registered in our program for talent valuation and management called ABACO.

The focus on education and the ongoing training of our teams is the lever on which the Group promotes local development from investments in employment-generating assets in the communities in which we are present.

In the last quarter of 2019, we enter a public/private cooperation agreement (Public Private Alliances for Development (APPD in Spanish), with the Spanish Agency for International Cooperation for Development (AECID in Spanish), between our Mozambican Group Company (PESCAMAR), the School of Fisheries in Matola (Mozambique), the Maritime and Fisheries Polytechnic Institute of the Atlantic (IPMPA in Spanish), Nueva Pescanova, S.L., and the aforementioned AECID, to strengthen the maritime-fishing capabilities in Mozambique. This two-year project with a budget of 242,000 euros aims to improve the nautical-fishing training of the students of the Matola School of Fisheries, starting with the transfer of knowledge from the IPMPA of Vigo. PESCAMAR undertakes, under this cooperation agreement, to incorporate several students from the Matola School of Fisheries as fishermen in its fleet in Mozambique.

## 2.2 Local population and territories

In Africa, the Group has a great presence in Namibia and Mozambique employing 2,375 people in Lüderitz and Walvis Bay (Namibia) and 870 people in Beira (Mozambique), where it has developed programs for the transfer of knowledge in fisheries-related trades, including fishing net manufacturing/repair, thus promoting the development of local employment.

The Group (through NOVANAM) contributes with education programs in Lüderitz (Namibia) with a Kindergarten for the children of our professionals, in which 86 boys and girls are cared for.

We have established programs to increase fish consumption among the Namibian population; in Mozambique we have helped the incorporation of fish protein into Mozambican meals through the commercialization of by-catch species accompanying our prawn fishing operation through local distribution channels.

In addition, we continue with programs that promote the recovery of flora such as palm trees in Lüderitz (Namibia), or to clean the environment and collect waste in the city of Beira (Mozambique).

In Latin America we are present in Guatemala, Nicaragua, Ecuador, Peru, Brazil, Argentina and Uruguay, where we continue to advance with environment management programs with the reforestation of native flora and mangroves and repopulation of native fauna, like the iguana; helping in the preservation of the Estero Real in Chinandega (Nicaragua). In 2019 we also took on a program for the repopulation of turtles and we have also carried out urban clean-up and the removal of clandestine dumping grounds in Champerico (Guatemala).

In the social aspect, we continue with our important education program at our school in the Guatemalan town of Champerico (called CEPAC), every year 610 students take their studies, from primary education to vocational training programs.

In addition, we maintain our professional internship programs in Ecuador and Nicaragua and we also actively participate in helping in natural disaster situations (cyclones, floods, etc.). Like the contribution of our subsidiaries in Mozambique (PESCAMAR GROUP) helping in the devastating aftermath of Cyclone IDAI that hit that country, more specifically in the city of Beira where our operations in this African country are based. The employees and vessels of PESCAMAR GROUP helped rescue hundreds of people in collaboration with local authorities and provided logistical support to Spanish aid-workers in the Sofala region. Also, the Group's headquarters in Spain, launched a fund-raising initiative that we called "SOS MOZAMBIQUE IDAI" among all the employees of the Nueva Pescanova Group to help alleviate the humanitarian emergency situation in Mozambique, especially among our employees and their families. This solidarity action, thanks to the generosity of thousands of employees of the Group worldwide, allowed us to raise 11,000 euros, which were given to 266 workers of our companies in Mozambique for the reconstruction of their homes.

## 2.3 Local communities and dialogue channels

Taking as a starting point the third pillar of **Our DNA** (*"We believe our first responsibility is the sustainability of natural resources and of our partner communities, whose trust we build and maintain by acting ethically and creating value"*), **Our Code of Ethics** devotes all Chapter III to *"the Group and its environment"*. In this way, the Group has identified its stakeholders and makes a special effort to promote and ensure the constant communication with the same and permanent identification of new channels of communication, as well as the integration of their expectations and the establishment of lines of action in this regard.

The relationships of the Nueva Pescanova Group and its professionals with its Stakeholders are based on collaboration, cooperation, involvement and two-way communication capable of building trust relationships on a continuous basis, built on ethical principles, equal treatment, transparency and active listening, allowing to consider the legitimate interests of the same and effectively communicating information on the activities and businesses of the Nueva Pescanova Group. Among the Stakeholders that we have formally identified, "local communities" understood as the group of people who relate to each other, according to certain legal and customary organizational rules, and who share the same culture in a certain space or time, and are related to the companies of the Nueva Pescanova Group.

The Nueva Pescanova Group has established channels of dialogue with these stakeholders in order to actively listen to their needs and expectations and to provide ethical and effective transfer of information from the activities of the different companies of the Group, thus establishing action plans that generate shared value. In addition to the usual communication channels in accordance with the Group's corporate communication strategy, which are the main channels for directing the Group's relationships with its stakeholders, there are other channels of dialogue with these local communities through the promotion, management and development of educational, cultural or sports activities.

Precisely, on March 27, 2019, the Board of Directors of Nueva Pescanova, S.L., approved our **Corporate Policy on Institutional Relations**, sets the way and manner in which we relate with our Stakeholders,

## 2.4 Association and sponsorship

In all the countries and locations where we are present, we are members of local, regional, or national associations that contribute to the social, economical, and environmental development, by setting permanent channels of dialogue with stakeholders in each country.

In a succinct way, such associations pursue the representation and interests of the fisheries, aquaculture, seafood processing and commercial industries, as well as the sustainability of these products, improving their quality, innovation, or comprehensive waste management, among other objectives. In view of the relevant areas identified and merely enunciatively, below there are some of the associations of which Group companies of the Nueva Pescanova Group are member, in Spain or in the different countries where we are present; namely:

- a. **Capture Fisheries:** ARVI (Cooperativa de Armadores de Pesca del Puerto de Vigo); CEPESCA (Confederación Española de Pesca); AMAPIC (Asociación Mozambiqueña de Armadores de Pesca Industrial de Langostino); CAPA (Cámara de Armadores de Poteros de Argentina), NHFA (Namibian Hake Fishing Association); CNFA (Confederation of Namibian Fishing); o COLTO (Coalition of Legal Toothfish Operators).



- b. **Aquaculture:** APROMAR (Asociación Empresarial de Acuicultura de España); CETGA (Clúster de Acuicultura de Galicia); ANDA (Asociación Nicaragüense de Acuicultores); and CNA (Cámara Nacional Acuicultura de Ecuador).
- c. **Processing:** ASEFAPRE (Asociación Española de Fabricantes de Platos Preparados); ANFACO-CECOPESCA (Asociación Nacional de Fabricantes de Conservas de Pescados y Mariscos – Centro Técnico Nacional de Conservación de Productos de la Pesca, España); AME (Asociación Multisectorial de Empresas de Alimentación y Bebidas, España); or FIAB (Federación Española de Industrias de Alimentación y Bebidas).
- d. **Commerce:** AECOC (Asociación Española de Codificación Comercial); GS1 Portugal – CODIPOR (*Associação Portuguesa de Identificação e Codificação de Produtos*); PROMARCA (Asociación Española de Empresas Fabricantes de Marcas Líderes de Gran Consumo); CENTROMARCA (*Associação Portuguesa de Empresas de Produtos de Marca*); o FMRE (Foro de Marcas Renombradas Españolas).
- e. **Sustainability:** GSSI (*Global Sustainable Seafood Initiative*); SFP (*Sustainable Fisheries Partnership*); GAA (*Global Aquaculture Alliance*); ECOEMBES (Ecoembalajes España, S.A.); or SPV (*Sociedade Ponto Verde*, Portugal).
- f. **R+D & Quality:** AINIA (Instituto Tecnológico de la Industria Agroalimentaria, España); AIMEN Centro Tecnológico (Asociación de Investigación Metalúrgica del Noroeste, España); or AEC (Asociación Española para la Calidad).
- g. **Advertising and communication:** AEA (Asociación Española de Anunciantes); AUTOCONTROL (Organismo Independiente de Autorregulación de la Industria Publicitaria en España); or DIRCOM (Asociación de Directivos de Comunicación, España).

With regard to sponsorships<sup>6</sup>, the Nueva Pescanova Group, through its Spanish and foreign companies, takes part in various initiatives and projects in the social, cultural, educational, development and cooperation fields, among other, in the countries and local communities in which it is present.

The most relevant, in the field of education are, the sponsorship through our foundation FUNDANOVA (Guatemala) of the CEPAC School in Champerico (Guatemala) and the kindergarten for the children of the employees of the NOVANAM processing plant in Lüderitz (Namibia).

In the social field, the most outstanding are: donations of food products to local communities and navy veterans in Namibia, to low-income families in Guatemala, cooperation with the association of parents with children with different capacities "Los Pipitos" or collaboration agreements with Food Banks in Spain.

In the environmental field, cooperation in clean-up programs in coastal areas, such as the cleaning up in Spain, through the *Programa Libera* together with ECOEMBES and SEO BIRDLIFE; in Namibia, cooperating with the, *National Clean Up Day*, on May 1; in Guatemala, clean-up and y whitewashing of sidewalks and removal or clandestine dumping grounds in Champerico; in

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<sup>6</sup> In this respect, in 2019, the Nueva Pescanova Group ha approved its Anti-corruption Code, whose article 8 precisely provides for the setting of certain conduct guidelines and prohibitions regarding our "Solidarity, Charity and Sponsorship Actions".

Mozambique with *Beach Clean up Day* in Beira; the key for the success of these programs being our sponsorship and the voluntary cooperation of our employees.

### 3. Subcontracting and providers

#### 3.1 Social, gender equality & environmental issues, social and environmental responsibility

Pursuant to our Corporate Policy on Procurement (article 3), in the approval and/or choice of suppliers, it shall be taken into account the ethical commitment, institutional integrity, sustainability and good corporate reputation of the candidates. To this end, the professionals of the Nueva Pescanova Group shall consider positive that a candidate has its own Code of Ethics or similar document in the field of conduct and good business practices and, in any case, shall ensure in a reasonable manner that the candidate to be approved or chosen is not or has not been related to activities or practices contrary to the principles contained in article 36.1 of *Our Code of Ethics*.

Additionally, upon subscribing the *Providers' Ethics and Social Charter* of the Nueva Pescanova Group, by signing the *Responsible Statement* attached thereto, our providers take on a series of commitments regarding social, gender equality, environmental and social and environmental responsibility issues, among other (articles 5, 6, 11 and 12).

#### 3.2 Providers supervision and audits

Upon subscribing, signing, and accepting our *Providers' Ethics and Social Charter*, the providers of the Nueva Pescanova Grupo consent to carry out verification activities to verify their proper compliance. For these purposes, Providers shall authorize the Nueva Pescanova Group and/or third parties designated by the Nueva Pescanova Group to carry out the appropriate checks, facilitating the means and access to their facilities, as well as the necessary documentation to ensure such checks in relation to compliance with this document. A Provider's failure to comply with our *Providers' Ethics and Social Charter* may, taking into account its severity and other concurrent circumstances, entail the immediate and early termination of its contractual relationship with the Nueva Pescanova Group, without prejudice to any other measures that may correspond to the Nueva Pescanova Group in due defense of its legitimate interest.

In 2019 we have not been made aware of any breach to our Providers' *Ethics and Social Charter* by any of the Providers who have subscribe it worldwide. o.

Regarding the approval of our providers of raw material and in the field of Food Safety, Quality and Environment, in 2019 we have performed **40 audits** to providers of raw material.

### 4. Consumers

As mentioned in section 4 of Chapter II of this Report, the Nueva Pescanova Group has its own code of conduct and good business practice (*Our Code of Ethics*) that establishes a set of conduct principles and guidelines aimed at ensuring an ethical, honest and responsible conduct of all its professionals. Thus, in terms of Quality and Food Safety *Our Code of Ethics*, reads:

- The quality and excellence of the products offered by Nueva Pescanova Group is 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 an extensive control of its products and processes regarding food safety and health.

- 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 providers that provide the relevant certificates on quality and food safety. In addition, the Group will maintain, always, internal processes in place to detect potential health risks, including necessary measures to resolve quality issues. In this sense, the Group has implemented the guidelines and policies necessary to offer its costumers and consumers fresh and top-quality products.

In this way, in we have approved the *Corporate Policy on Quality and Food Safety* of the Nueva Pescanova Group in order to (i) define the scope, the principles and serve as a reference for the definition of the objectives of the actions that ensure and guarantee the Quality, Food Safety and Excellence of the products we offer, and (ii) contribute to the promotion of a Quality and Excellence Culture, developing the necessary communication, awareness and training actions for all our professionals and collaborators so that they acquire the commitment and actively participate in its achievement.

Consumer are the foundation of our value offering, based on meeting their needs and meeting their expectations, therefore our products meet the strictest levels of food safety and quality, are healthy, nutritious and pleasurable, and the production processes are developed with the best available techniques and are based on efficiency and sustainability.

#### 4.1 Measures for consumers' health and safety

In particular, the Group's *Corporate Policy on Quality and Food Safety* is aligned with our *Corporate Policy on CSR* and, more specifically, with the commitments we assume in the *Products* pillar in our *CSR Strategy*. One of the commitments assumed regarding this pillar is to offer consumers innovative and healthy seafood products, researching and communicating the importance of the nutritional value of seafood products in their diet. Regarding this commitment, in 2019 the Nueva Pescanova Group has collaborated in a studied called 'Melipop', by donating seafood products for a clinical trial with boys and girls at risk of suffering from obesity, aimed at the prevention o childhood obesity by following a Mediterranean lifestyle.

To contribute to a better deployment of the *Quality and Food Safety Function* in the Group, we have formally established our **Quality Excellence PESCANOVA** whose pillars are:

#### ENCOURAGING THE CULTURE OF QUALITY AND FOOD SAFETY

- Awareness-raising and consciousness through the entire organization.
- Monitoring each of the processes in the value chain.
- Encouraging decision taking based on data.
- Implementing a global reporting system based on KPIs.
- Development of a training plan.

#### ENSURING THE BEST INDUSTRIAL AND OPERATIONAL QUALITY AND FOOD SAFETY

- Guaranteeing the food safety of our products.
- Developing continuous improvement of processes, services and products.
- Encouraging self-control of production processes
- Protecting the control of internal and external production.

#### ENSURING THE SUPERIORITY OF PERCEIVED QUALITY

- By consumers.
- By customers.
- By the organization.

The **Quality Excellence PESCANOVA** program is based on our *Food Safety, Quality and Environment Management System (FSQES)* with special reinforcement and improvement in aspects related to the *Quality perceived by the Consumer*:



Our **FSQES** pivots, in turn, around two systems:

- Compliance with legal requirements (*Food Compliance*): Through the *INTRAL* tool we receive a permanent, personalized, and updated service on Hygiene and Food Safety regulations.
- Hazard Analysis and Control of Critical Points (**HACCP**): A system to control and analyze the hazards and critical control points of potential food contamination by microbiological, physical, and chemical agents. Our HACCP sub-system has been implanted following the seven basic principles in the *Codex Alimentarius*.

As far as Governance and Management of our **FSQES**, the Global R&D, Quality and Environment Office is responsible for setting the guidelines for the **FSQES** of the Nueva Pescanova Group and verifying its compliance.

On the other hand, the managers of the industrial centers, and other production and commercial units are the ultimate responsible for the proper and effective operation of **FSQES**. The person responsible of the **FSQES** in the industrial centers, who depend hierarchically on the managers of their centers and functionally of the Manager of the Global R&D, Quality and Environment Office, is responsible for the daily management of **FSQES** in accordance with the guidelines set out by the aforementioned Corporate Office and send the relevant information and report promptly whenever there are non-conformities and/or critical deviations.

As regards to *Certifications*, our **FSQES** are based on the compliance with requirements in the most demanding, international, most advanced, and most prestigious certifying bodies:



Apart from the implementation of these benchmarks, the Nueva Pescanova Group companies, certain plants or centers may also have other certifications to adequately satisfy the requests of our customers, aligned with the recommendations coming from competent authorities and/or in the execution of particular strategies of the Group in this field. Thus, the map of the certifications and benchmarks that we have in our centers and processing plants around the world are shown below:



In all cases, the certifications and benchmarks implemented in our centers and processing plants are Audited to evaluate compliance with the established requirements. These audits are



carried out by external auditors belonging to duly accredited bodies and, where possible, by technicians of organizations of recognized international prestige in this field (such as, LRQA (Lloyd's Register Quality Assurance), SGS (Société Générale de Surveillance), BUREAU VERITAS, among other). The periodicity of these audits is set out by each of these certifying bodies.

Apart from these external audits, the Nueva Pescanova Group performs its own internal audits whose main objective is to monitor compliance with current legislation, identify deviations and implement corrective actions. In 2019 a total of 50 internal audits have been carried out on *IFS*, *ISO14001*, *GLOBAL GAP*, *BAP*, *INP* certifications and decalogues.

In 2019 the Nueva Pescanova Group has implemented its **HACCP** in its 8 new Asian food processing plants, and all of them have passed the implementation decalogues.

Similarly, in 2019 the Nueva Pescanova Group has assessed the impact on health and safety of 100% of product categories and the compliance with the information and labelling requirements of 100% of its products, as set in the legislation currently, by assessing information regarding:

- (i) Origin for product components;
- (ii) Product contents through the list of ingredients;
- (iii) Safe use of products;
- (iv) Product elimination and social and environmental impacts; and last,
- (v) The precautionary statement of ingredients.

Another important element or component of the **FSQES** are our own *Food Technical Standards* (*hereinafter FTSs*), that set the specific requirements applicable to Nueva Pescanova Group companies in the field of Food Safety, Quality and Environment which are mandatory and inexcusable. Compliance with requirements in our **FTSs** is mandatory in all the Group. The number of **FTSs** approved by the Global R&D, Quality and Environment Office and in force at December 31, 2019 are 40.

the Global R&D, Quality and Environment Office has its own intranet or web portal on Food Safety, Quality and Environment Systems (**FSQES PORTAL**) to be used by all Group's employees with competence in this field. Our **FSQES PORTAL** is a basic management and improvement tool, it includes a home page with open access to those users authorized from all the Nueva Pescanova Group companies and a set of pages dealing with FSQES of each company whose access is restricted to the users authorized in each of them (access codes are provided by the Global R&D, Quality and Environment Office).

The home page of the **FSQES PORTAL** is managed by the persons of this Corporate office and its objective is to offer users, in an easy and integrated way, access to a number of resources and services related to Food Safety, Quality and Environment (Applicable Documentation – Food Technical Standards, Manuals, Specifications, etc.); Applications – complaints and actions management-; Internet Fora; News and Events or Links of Interest).



All updated documents and formats regarding the **HACCP** are available in the **FSQES PORTAL**. All the group companies, through the Portal or via e-mail, with the periodicity determined by the system or as soon it is received or generated, have to provide the Global R&D, Quality and Environment the following mandatory records:

- **Food Safety, Quality and Environment**
  - Certificates of compliance with Standard (*IFS, GLOBAL GAP, etc.*).
  - Audit reports on Action Regulations and Plans (*IFS, ISO 9001, etc.*).
  - Audit reports from customers and action plans.
  - Inspection records issued by competent authorities.
  - Updated Product Control Plan.
  - Results from microbiologic and chemical analysis (*SO<sub>2</sub>, contaminants, heavy metals, residues, etc.*) included in the Product Control Plan.
  - Results from microbiologic and chemical analysis (*SO<sub>2</sub>, contaminants, heavy metals, residues, etc.*) performed by customers or inspection authorities.
  - Complaints that have not been processed through the Portal.
- **Environment**
  - Annual Environmental Legal Compliance Report.
  - Inspection records issued by competent authorities.
  - Result for environmental analysis (*discharges, atmospheric emissions, noise, etc.*).

Thus, apart from the routine filing of records in the **FSQES PORTAL**, this tool allows the Global R&D, Quality and Environment Office to monitor any deviation and/or non-conformity that the people responsible of the **FSQES** have reported.

#### 4.2 System for claims, complaints, and their resolution

Consumers are at the heart of our activities, so the Nueva Pescanova Group has a Complaint Management Manual (M-02 as coded in FSQES), whose objective is to define the general for receiving, processing and managing complaints made by customers and consumers. This Manual is based on the following process and graphic chart: getting and management of claims made by customers and consumers. The above manual is based on the route and graphical diagram below:



The implementation of a *Complaints Management System* aims to:

- Streamline the process from reception to internal distribution of complaints.
- Standardize the actions undertaken by the different divisions of the Nueva Pescanova Group.
- Provide the information that enables decision-making oriented towards improving satisfaction of customers and consumers.

About the *PROCESS FOR THE MANAGEMENT, CONSULTATION AND MONITORING THE COMPLAINTS RECEIVED*, this is done, as indicated in the previous section of this Chapter, through our FSQES PORTAL:

- To access the complaints section, it is necessary to be registered as complaints manager with a “user code” and “access code” provided by and centralized in the Global R&D, Quality and Environment Office.
- The commercial operator who receives a complaint must reply to the customer/consumer confirming that they have received the complaint and that the same will be immediately processed and managed within 24 hours, at most. All complaints are processed and managed through the system, regardless of their relevance or seriousness, and no prior assessment is made to consider their inclusion, or not, in the system.
- The commercial operator designated in each company of the Nueva Pescanova Group will open a complaint provided it has been received from a customer/consumer (External Complaints) or arises from having detected a non-conformity regarding a product/service supplied by another company belonging to the Group (Internal Complaints).

- On the other hand, those assigned to carry out the internal management of the system will also enter a complaint in case they receive it directly (via e-mail, telephone, internal communication etc.), indicating the company or office of the Group from which it was received. The entering of a complaint in the FSQES **PORTAL** must be done on the same day it is received or within 2 days at most.
- The description of the complaint must include all available information about the incident detected, providing photographs and other documents that can facilitate its internal management.
- The commercial operator designated will, as soon as possible, contact the affected customer/consumer (in 2 days time at most) to confirm the information available, give a final answer and if this is not possible indicate the next steps and the continuation of the internal investigation.

The Global R&D, Quality and Environment Office monitors the steps taken regarding all complaints received on an individual basis in order to establish the supervision of the procedures carried out and / or make the request for the opening of corrective and / or preventive actions if deemed necessary. Specifically, in the **FSQES** there is a Manual for the Management of Corrective and Preventive Actions (**M-03** as coded in **FSQES**) aimed at:

- Standardize actions taken by the different business units of the Nueva Pescanova Group.
- Provide information that enables improvement-oriented decision-making.

These actions are also managed through a specific section in our **FSQES PORTAL**.

In this sense, all complaints received during the last 12 months, classified by origin/cause, are reviewed monthly. In those cases where seriousness and/or repetitiveness advises it, corrective actions and/or substantial improvement projects will be requested to ensure the eradication of the same. The Global R&D, Quality and Environment Office sends a Monthly Report to the Group's commercial companies and industrial centers to facilitate the review of incidents and the implementation of actions.

In addition, and as a further quality indicator, complaints are reviewed, also monthly, by analyzing: **(i)** The number of complaints of the last 12 months compared to the same period of the previous year; **(ii)** Detail of last month's complaints; **(iii)** The number of complaints based on the classification (origin) of the last 12 months; and **(iv)** The number of complaints per tons processed.

In 2019, through the **FSQES PORTAL** we have received 1,768 complaints, of which 431 were from consumers and 1,337 from customers, mainly related to organoleptic characteristics, packs and packaging, defective products, or presence of foreign matter. It is worth mentioning that in 2019 we have incorporated into our **Complaints Management System** new processing plants and/or work centers, and therefore the number of complaints received this year is not comparable to last year's. 100% of the complaints and objections received in 2019 were solved and closed at the date of issuance of this Report.

#### 4.3 Privacy and personal data protection

The Nueva Pescanova Group has a *Data Protection and Privacy Committee* whose operation is governed by its own *Regulations*; the members of this Committee are the Chief Compliance Officer, the Global Manager of Systems and IT, the Deputy Manager of Legal Advice and Compliance, the Corporate Manager of Labor Relations and the Corporate Head of Digital Marketing.

This Committee was set up to ensure and supervise the implementation of the *Corporate Personal Data Protection Policy*; its operation and actions are supervised by the Group's Executive Committee. In addition, for the companies of the Nueva Pescanova Group in Spain, this Committee performs the same duties which traditionally and until the latest legislative reforms in force in Europe and Spain were performed by the Head of Security, for the purposes and in the terms provided for in the current regulations, coordinating and controlling the security measures for the protection of personal, technical and organizational data. Likewise, this Committee may exercise the duties assigned to the Data Protection Officer pursuant to Regulation (EU) 2016/679, with the amendments and variations appropriate as a result of the voluntary or mandatory duties for such a position resulting from European legislation and/or any Spanish regulations (Organic Law 3/2018, of December 5, on the Protection of Personal Data and Guarantee of Digital Rights).

With regard to the exercise of individual rights on personal data of consumers and other users through the *Mailbox of the Data Protection and Privacy Committee* ([comite.datos.privacidad@nuevapescanova.com](mailto:comite.datos.privacidad@nuevapescanova.com)), in 2019 nine (9) files have been processed and favorably resolved, most of them were related to the erasure or rectification of personal data. In addition, in 2019, the Committee assisted in the resolution of three (3) files relating to consumers' exercise of individual rights on personal data that were received through the Consumer Service "Consumer Suggestions".

In accordance with the provisions in the *User Manual of the Information and Communication Systems of the Nueva Pescanova Group* and in the *Security Document on Protection of Personal Data of the Group in Spain*, there are procedures for the management of incidents and security breaches handled by the Corporate Systems and IT Office, which periodically reports to the *Data Protection and Privacy Committee*. In 2019, there have been no relevant incidents or security breaches that have presented a serious risk to the rights and freedoms of natural persons.

## 5. Tax disclosures

### 5.1 Results obtained

The 2019 result before tax and consolidation adjustments by Cash Generation Unit (CGU)<sup>7</sup>, is shown below:

CGU	2019
Aquaculture - Vannamei	(6,234,554)
Commercial & Other	(22,515,800)
Capture Fisheries - Africa	2,170,333
Capture Fisheries - Southern Cone	6,168,039
<b>Total</b>	<b>(20,411,981)</b>

### 5.2 Corporate Income Tax

The global tax on corporate income paid in 2019 by the Nueva Pescanova Group was 15,351,504.63 euros.

### 5.3 Public Grants

In 2019 various Spanish and foreign companies of the Nueva Pescanova Group have been awarded public grants for a global amount of 2,086,094 euros.

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<sup>7</sup> The countries in each of those CGUs are the following: **CGU Aquaculture - Vannamei** (Ecuador, Guatemala and Nicaragua); **CGU Commercial & Other** (Brazil, Spain, France, Italy, Ireland, Greece, Mexico –the company in this country, NOVAOCEANO, does not belong to the Nueva Pescanova Group, December 31, 2019–, Portugal and USA); **CGU Capture Fisheries – Africa** (Namibia, Mozambique and South Africa); and **CGU Capture Fisheries – Southern Cone** (Argentina, Peru and Uruguay).

## ANNEX I. TABLE OF CONTENTS REQUIRED BY LAW 11/2018 OF 28 DECEMBER

Pursuant to the provisions in Law 11/2018 of 28 December on Non-Financial and Diversity Information, the following is a table of equivalences between the issues to be covered by the Non-Financial Reporting Statement in accordance with Law 11/2018 of 28 December and the corresponding general and thematic standards of the *Global Reporting Initiative* (GRI) taken as a reference to report appropriate information on such material aspects, also indicating the page number in this Report containing such information:

Table of contents required by Law 11/2018, of december 28			
Information required by Law 11/2018	Materiality	Page	GRI content
<b>Overview</b>			
A brief description of the business model that includes your business environment, organization and structure	Material	3	GRI 102-2 GRI 102-7
Markets in which you operate	Material	3	GRI 102-3 GRI 102-4 GRI 102-6
Objectives and strategies of the organization	Material	3	GRI 102-14
Main factors and trends that may affect your future evolution	Material	5	GRI 102-14 GRI 102-15
Reporting framework used	Material	3	GRI 102-54
Materiality Principle	Material	9	GRI 102-46 GRI 102-47
<b>Environmental issues</b>			
<b>Management approach</b>			
Description and results of policies on these issues as well as the main risks related to these issues which are relevant to the group's activities	Material	7	GRI 102-15 GRI 103-2
<b>Detailed overview</b>			
Detailed information on the current and foreseeable effects of the company's activities on the environment and, where appropriate, health and safety	Material	17	GRI 102-15
Environmental assessment or certification procedures	Material	18	GRI 103-2
Resources dedicated to the prevention of environmental risks	Material	18	GRI 103-2
Application of the precautionary principle	Material	17	GRI 102-11
Number of provisions and guarantees for environmental risks	Material	18	GRI 103-2
<b>Pollution</b>	Not Material	32	N/A
<b>Circular economy and waste prevention and management</b>			
Prevention, recycling, reuse, other forms of waste recovery and disposal	Material	22	GRI 103-2 GRI 306-2
Actions to combat food waste	Material	25	GRI 103-2 GRI 306-2
<b>Climate change</b>			
Greenhouse gas emissions generated as a result of the company's activities, including the use of the goods and services it produces	Material	25	GRI 305-1 GRI 305-2
Measures taken to adapt to the consequences of climate change	Material	25	GRI 103-2
Voluntary medium- and long-term targets for the reduction of greenhouse gas emissions and the means implemented for this purpose	Material	25	GRI 103-2
<b>Protecting biodiversity</b>			
Measures taken to preserve or restore biodiversity	Material	29	GRI 304-3
Impacts caused by activities or operations in protected areas	Material	31	GRI 304-1 GRI 304-2
<b>Sustainable use of resources</b>			
Water usage and water supply according to local constraints	Material	18	GRI 303-5 (GRI Version 2018)
Consumption of raw materials and measures taken to improve the efficiency of their use	Material	21	GRI 301-1
Direct and indirect energy usage	Material	21	GRI 302-1
Measures taken to improve energy efficiency	Material	21	GRI 103-2 GRI 302-4
Use of renewable energy	Material	21	GRI 302-1



Table of contents required by Law 11/2018, of december 28			
Information required by Law 11/2018	Materiality	Page	GRI content
<b>Social and personnel issues</b>			
<b>Management approach</b>			
Description and results of policies on these issues as well as the main risks related to these issues which are relevant to the group's activities	Material	32	GRI 102-15 GRI 103-2
<b>Employment</b>			
Total number and distribution of employees by country, gender, age group and professional category	Material	33	GRI 102-8 GRI 405-1
Total number and distribution of employment contract modalities and annual average of indefinite contracts, temporary contracts and part-time contracts by gender, age group and professional category	Material	34	GRI 102-8
Number of layoffs by gender, age and professional category	Material	35	GRI 103-2
Average remuneration and evolution broken down by gender, age group and professional category or equal value	Material	35	GRI 103-2 GRI 405-2
Pay gap, pay for equal jobs or average pay in society	Material	37	GRI 103-2 GRI 405-2
Average remuneration of directors and senior officers, including variable remuneration, allowances, compensation, payment to long-term savings systems and any other pay broken down by gender	Material	38	GRI 103-2 GRI 405-2
Implementation of work disconnection policies	Material	38	GRI 103-2
Number of employees with a disability	Material	38	GRI 405-1
<b>Organization of work</b>			
Organizing working time	Material	38	GRI 103-2
Number of absence hours	Material	39	GRI 403-9 (GRI Version 2018)
Measures to facilitate life-work reconciliation and encourage co-responsibility of both parents	Material	39	GRI 401-3
<b>Health and safety</b>			
Occupational health and safety conditions	Material	39	GRI 403-1 to 403-3 GRI 403-7 (GRI Version 2018)
Occupational accidents, in particular their frequency and severity, as well as occupational diseases; broken down by gender	Material	40	GRI 403-9 GRI 403-10 (GRI Version 2018)
<b>Social relations</b>			
Organization of social dialogue including procedures to inform and consult staff and negotiate with them	Material	41	GRI 103-2
Percentage of employees covered by collective bargaining agreement and country	Material	41	GRI 102-41
Balance of collective agreements, particularly in the field of occupational health and safety	Material	41	GRI 403-4 (GRI Version 2018)
<b>Training</b>			
Policies implemented in the field of training	Material	42	GRI 103-2 GRI 404-2
Total number of training hours per professional category	Material	43	GRI 404-1
<b>Universal integration and access of people with a disability</b>	Material	47	GRI 103-2
<b>Equality</b>			
Measures taken to promote equal treatment and opportunities for women and men	Material	45	GRI 103-2
Equality plans, measures taken to promote employment, protocols against sexual or gender harassment	Material	44	GRI 103-2
Policy against all types of discrimination and, where appropriate, diversity management	Material	47	GRI 103-2
<b>Respect for human rights</b>			
<b>Management approach</b>			
Description and results of policies on these issues as well as the main risks related to these issues which are relevant to the group's activities	Material	47	GRI 102-15 GRI 103-2
<b>Implementation of due diligence procedures</b>			
Implementation of human rights due diligence procedures and prevention of human rights violation risks and, where appropriate, measures to mitigate, manage and remedy possible abuses committed	Material	48	GRI 102-16 GRI 102-17 GRI 412-1 GRI 412-2
Complaints of human rights violations	Material	51	GRI 103-2 GRI 406-1
Measures implemented for the promotion and enforcement of the fundamental provisions of ILO's Conventions relating to respect for freedom of association and the right to collective bargaining; elimination of discrimination in employment and occupation; elimination of forced or compulsory labor; effective abolition of child labor	Material	47	GK1:N73RI 103-2 GRI 407-1 GRI 408-1 GRI 409-1

Table of contents required by Law 11/2018, of december 28			
Information required by Law 11/2018	Materiality	Page	GRI content
<b>Fighting corruption and bribery</b>			
<b>Management approach</b>			
Description and results of policies on these issues as well as the main risks related to these issues related to the group's activities	Material	52	GRI 102-15 GRI 103-2
Measures taken to prevent corruption and bribery	Material	52	GRI 103-2 GRI 102-16 GRI 102-17 GRI 205-2
Measures to combat money laundering	Material	52	GRI 103-2 GRI 102-16 GRI 102-17 GRI 205-2
Contributions to foundations and non-profit entities	Material	55	GRI 102-13 GRI 201-1
<b>Information about society</b>			
<b>Management approach</b>			
Description and results of policies on these issues as well as the main risks related to these issues which are relevant to the group's activities	Material	55	GRI 102-15 GRI 103-2
<b>Company commitments to sustainable development</b>			
The impact of society's activity on employment and local development	Material	55	GRI 103-2
The impact of society's activity on local populations and the territory	Material	57	GRI 413-1 GRI 413-2
The relationships with local community actors and the modalities of dialogue with local communities	Material	57	GRI 102-43 GRI 413-1
Partnership or sponsorship actions	Material	58	GRI 103-2 GRI 201-1
<b>Outsourcing and suppliers</b>			
Inclusion in the policy of purchasing social, gender equality and environmental issues	Material	60	GRI 103-2
Consideration in relationships with suppliers and subcontractors of their social and environmental responsibility	Material	60	GRI 308-1
Monitoring systems and audits and results of the same	Material	60	GRI 308-2 GRI 414-2
<b>Consumers</b>			
Measures for consumer health and safety	Material	61	GRI 103-2 GRI 416-1
Complaint systems, complaints received and their resolution	Material	65	GRI 103-2 GRI 418-1
<b>Tax</b>			
Benefits obtained by country	Material	69	GRI 207-4 (Version 2019)
Corporate income tax paid	Material	69	GRI 207-4 (Version 2019)
Public grants received	Material	69	GRI 201-4