



# CORPORATE OCCUPATIONAL HEALTH AND SAFETY POLICY OF THE NUEVA PESCANOVA GROUP

*Approved by the Executive Committee (COMEX) of the Nueva Pescanova Group in its Meeting held on August 30, 2018*

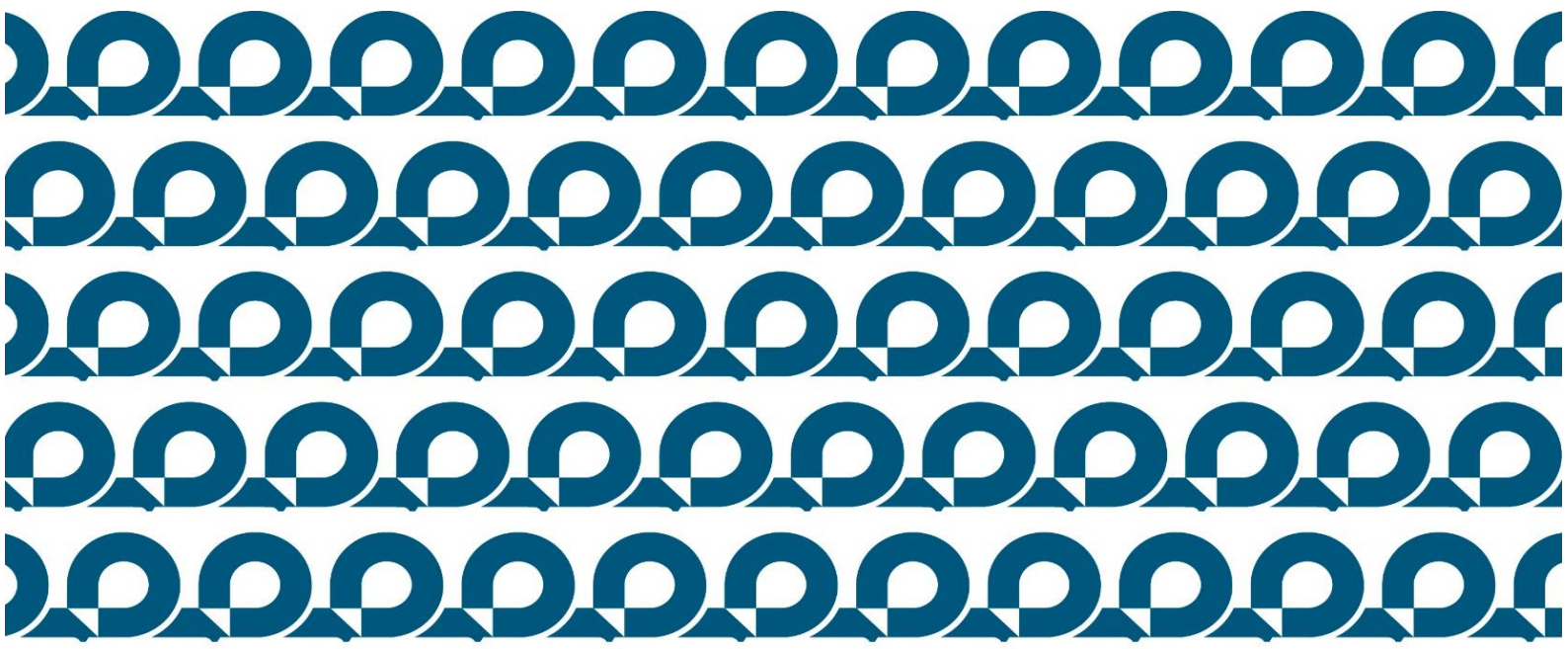


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## *Preamble*

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1. The Nueva Pescanova Group is a multinational business group engaged in the fishing, farming, processing, and commercialization of seafood products, especially fish and shellfish. The Group considers persons as a key factor of its corporate activity and defends and promotes the compliance of internationally recognized human and labor rights, being energetically committed to offering its employees and collaborators, independently of the geographic location in which their professional labor is undertaken, safe, healthy and fair working and living conditions, always strictly respecting the local, national or international labor risk prevention regulations that result from application.
2. In this sense, The Nueva Pescanova Group counts on its own code of conduct and good corporate practice denominated "Our Ethical Code" (approved by the Nueva Pescanova, S.L. Administration Council, head and holding entity of the Group), of application to all the Group's Spanish and foreign societies and to all the professionals that are incorporated, in which is contained a set of principles and patterns of conduct directed to guarantee the integral and responsible legal, ethical behavior of all its professionals.
3. In conformity with that anticipated specifically in Our Ethical Code in the subject of health and safety at work:
  - a. The Nueva Pescanova Group will always promote, where it operates, the establishment and facilitation to its professionals of the necessary means so that they undertake their activity with adequate safety and hygiene measures with the aim of safeguarding, always and in any situation, its physical and moral indemnity and integrity.
  - b. The Nueva Pescanova Group promotes and will promote, always and in every place in which it carries out its activities, occupational health and safety programs that comply with the applicable occupational risk prevention regulations in effect.
  - c. The professionals of the Nueva Pescanova Group will observe the regulations related to occupational health and safety with special attention, with the objective of preventing and minimizing the occupational risks.
  - d. The Subjects of the Code (councilors, directives, representatives and other professionals and employees of the Group, in any place in the world and whatever its contractual form may be when they act in their condition as such) are responsible to comply rigorously with the health and safety at work regulations, and to safeguard their own health and that of the people affected by their activities.
  - e. The Nueva Pescanova Group will promote the providers with which it operates complying with their regulations and programs in the subject of health and safety.
4. In relation with point e. of the previous section, all the providers, administrators, temporary work companies and subcontractors (to those which, together, we denominate "suppliers") have to accept and subscribe to Our Ethical and Social Provider's Card, assuming the obligation expressly to guarantee their employees and collaborators a safe working environment, always complying with the occupational safety, health and hygiene requirements anticipated in the applicable legislation on the prevention of occupational risks, in accordance with the internationally accepted regulations.
5. This Corporate Policy then, is framed in the firm and unequivocal commitment of the Nueva Pescanova Group, stated and announced formally and publicly by its Administration Council in Our Ethical Code, to count on some robust risk, health and work climate management systems and of the maximum technical and organizational quality, not only respectful of the applicable occupational risk prevention regulations in each one of the jurisdictions and locations where it is present, but also aligned with the best practices and reference frameworks of greatest exigency and excellence that currently exist in this field.

## **CHAPTER 1. GENERAL RULINGS**

### **Article 1. Objective**

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1. This Corporate Policy has as its objective to develop the commitments gathered in Our Ethical Code, as well as expressing the firm assumption on the part of the Group's High Management of the preventive

culture as an integral and essential part of its management, for a question of achieving a safe and healthy work environment for all the persons in all the Nueva Pescanova Group's working centers, as well as in its fields of influence.

2. This Corporate Policy, equally, crystallizes the Nueva Pescanova Group's commitment to always safeguard and in all places, the life, health, and physical and moral integrity of its professionals and of the third parties that provide it services in its facilities and working centers, complying scrupulously with the occupational risk prevention regulations that result applicable and facilitating the necessary means so that the work is carried out with the adequate safety and hygiene measures.
3. All the Nueva Pescanova Group's professionals, independently of their hierarchical, functional position or geographical location, will carry out their activity complying with the working risk prevention legislation and regulations in force in each place and within the directives, instructions and rules contained in the risk management and work health systems installed at corporate level and/or in each one of the Group's Spanish or foreign societies.
4. All the Nueva Pescanova Group's professionals must know and always comply with the legislation on occupational risk prevention that are applicable, which constitutes the fundamental basis of the preventive culture and in compliance of the Group's labor regulations, whose ownership corresponds particularly with the Labor Climate and Risk Prevention Corporate Management, integrated in the Group's Persons Corporate Department, without prejudice of the attributions that correspond to the Nueva Pescanova, S.L. Administration Council in that respect.

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

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1. This Corporate Policy must be complied with by all the professionals of the Nueva Pescanova Group
2. The Nueva Pescanova Group is made up of the Spanish company Nueva Pescanova, S.L. (parent company) and all the Spanish and foreign companies (subsidiaries) controlled, directly or indirectly, by the parent company Nueva Pescanova, S.L.
3. By professionals of the Nueva Pescanova Group, we mean every director, manager, representative and employee of the Nueva Pescanova Group, regardless of their location and employment relationship with the company.

### **CHAPTER II. CONFIGURATING ELEMENTS OF THE NUEVA PESCANOVA GROUP'S PREVENTIVE CULTURE IN THE FIELD OF OCCUPATIONAL HEALTH AND SAFETY**

#### **Article 3. Information, training, and skills**

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The Nueva Pescanova Group will permanently promote, develop, and execute the informative, training and skills actions necessary so that its employees are adequately informed, trained, and prepared in relation to the incidence of its work in the safety of persons, processes, and facilities.

#### **Article 4. Awareness raising and sensitization**

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The Nueva Pescanova Group will regularly foment, through duly planned awareness raising and sensitization campaigns, that its employees always and on all occasions behave respectfully with the health and safety of the workers, both for their own health and safety and for that of their companions and third parties with which they could interact in their labor and professional activity.

#### **Article 5. Global standards of occupational health and safety**

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The Nueva Pescanova Group will promote the exchange of the best practices in the application of the defined global standards of occupational health and safety, continually improving them, being more and more exigent and efficacious.

### CHAPTER III. THE CONCEPT OF OCCUPATIONAL HEALTH AND SAFETY IN THE NUEVA PESCANOVA GROUP

#### Article 6. The basic pillars of the concept of working health and safety in the Nueva Pescanova Group

The basic pillars of the concept of occupational health and safety in the Nueva Pescanova Group are 5:

- a. The quality, productivity and profitability of its activities are as important as the health and safety of its workers. All of those are permanent and fundamental objectives.
- b. The health and safety of the workers must always prevail. All the risks must be duly evaluated and, in its case, avoided or minimized, the necessary resources being destined for that.
- c. The continual improvement of working risk prevention management in all fields is a fundamental variable for the future of the Group's companies and its sustainability.
- d. The necessary compliance with the legislation in the subject of working risk prevention will be present in all the Group's decisions, as well as the good practice codes and other commitments voluntarily assumed by the Group.
- e. To ensure the complete integration of the working health and safety principles in all the Group's sectors.

#### Article 7. Global occupational health and safety system of the Nueva Pescanova Group

The Nueva Pescanova Group is committed to develop and implement a global occupational health and safety system for the whole Group based on standards in the subject of occupational health and safety, that determines the minimum levels, and that ensures the harmonization of the criteria applied in all the Group's societies. This global system will consider:

- a. The integration of the occupational health and safety criteria in all the phases of the productive process, in all the working methods and in all the decisions, in such a way that the directors, technicians, managers and workers assume their responsibility in the subject.
- b. The efficient identification, evaluation and control of the risks associated with work.
- c. The adaptation between the employee and their workplace through the surveillance of health and training of the workers.
- d. An evaluation mechanism in the subject of occupational health and safety in accordance with the standards established for the whole Group, to identify possible deviations, exchange the best practices and establish a global culture of excellence in the prevention of occupational risks.

#### Article 8. Cooperation and participation

1. The Nueva Pescanova Group considers that the cooperation of the workers is indispensable to preserve and improve the health and safety conditions at work.
2. The Nueva Pescanova Group will always favor the participation of all the workers in the promotion of health and safety pro-actively through communications of working risks, and other communications (suggestions of improvement) that will be analyzed and valued for their integration in the Working Risk Prevention Management System.
3. The Nueva Pescanova Group, as part of its proactive preventive culture, will establish strict collaborative relationships with the different competent Public Administrations in the subject of working health and safety with the aim of being a positive reference in this subject where the Group carries out its activity.

#### Article 9. Suppliers and contractors

1. All the providers and contractors of the Nueva Pescanova Group will assume the obligation of guaranteeing their employees and collaborators a safe working environment, always complying with the

working safety, health and hygiene requirements anticipated in the applicable legislation about working risk prevention, in accordance with the internationally accepted regulations.

2. The Nueva Pescanova Group will demand the contractors and providers, always and without exception, the respect of the established safety regulations, making them also participants in the preventive culture installed in the Group.

#### **Article 10. Continual improvement and periodic revision of the occupational health and safety management systems**

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1. The Nueva Pescanova Group assumes the principle of continual improvement as a key element of its preventive culture and of the adequate management of its working risks.
2. The Nueva Pescanova Group is committed to perform a periodic revision of the working health and risk management systems as many times as should be necessary, with the aim of maintaining the efficiency for which it has been created.

### **CHAPTER IV. CONTROL, EVALUATION AND REVIEW**

#### **Article 11. Control**

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It is the responsibility of the Work Climate and Risk Prevention Corporate Management to control the installation, development, and compliance with this Corporate Policy in the whole Nueva Pescanova Group, as well as safeguarding and coordinating the installation of the risk management and occupational health systems that turn out necessary to guarantee their compliance, giving account of all this to the Group's High Management.

#### **Article 12. Periodic evaluation**

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The Work Climate and Risk Prevention Corporate Management will periodically evaluate the compliance and efficacy of this Corporate Policy and of the occupational health and risk management systems of the Nueva Pescanova Group, giving account of all this to the Group's High Management.

#### **Article 13. Continual review**

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The Work Climate and Risk Prevention Corporate Management will periodically review, and whenever it is necessary, this Corporate Policy and will propose the modifications and updates that contribute to its continual development and improvement to the Group's Executive Committee.

### **CHAPTER V. FINAL RULINGS**

#### **Article 14. Dissemination, training, and communication**

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It is the responsibility of the Compliance Unit to promote, in collaboration with the Corporate Directorates of Development and Training and of Communication, the appropriate dissemination, training and information activities to ensure that all the professionals of the Nueva Pescanova Group are aware of this Corporate Policy and any possible criminal risks prevention programs that may be implemented in the companies of the Group.

#### **Article 15. Approval, validity, and amendments**

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1. This Corporate Policy was approved by the Nueva Pescanova Group's Executive Committee, at the proposal of the Corporate Persons Director and the Director of the Work Climate and Risk Prevention Corporate Management, in their meeting on the date of August of 2018.

This Corporate Policy was presented to consultations of the workers' representatives in the heart of the corresponding Health and Safety Committees of the Group's centers, without changes, additions or modifications to the original text approved by the COMEX having been formulated, being thus given by definitive text once the referred period of consultations was concluded, entering into force and being effective for the whole Nueva Pescanova Group since then.

2. Any modification of this Corporate Policy will have to be approved by the Nueva Pescanova Group's Executive Committee, at the proposal of the Corporate Persons Director and/or the Director of the Work Climate and Risk Prevention Corporate Management.

**Article 16. Modification Control**

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Version	Modification Summary	Modification Promoter	Modification Approval Entity	Modification Approval Date
V_1	Approval of the initial text of this Corporate Policy	Corporate Persons Director / Director of the Work Climate and Risk Prevention Corporate Management	COMEX	August 30 <sup>th</sup> 2018

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Work Climate and Risk Prevention Corporate Management

