



CORPORATE POLICY ON FOOD QUALITY AND SAFETY IN THE NUEVA PESCANOVA GROUP

2nd version approved by the Executive Committee (COMEX) of the Nueva Pescanova Group in its Meeting held on January 27, 2021

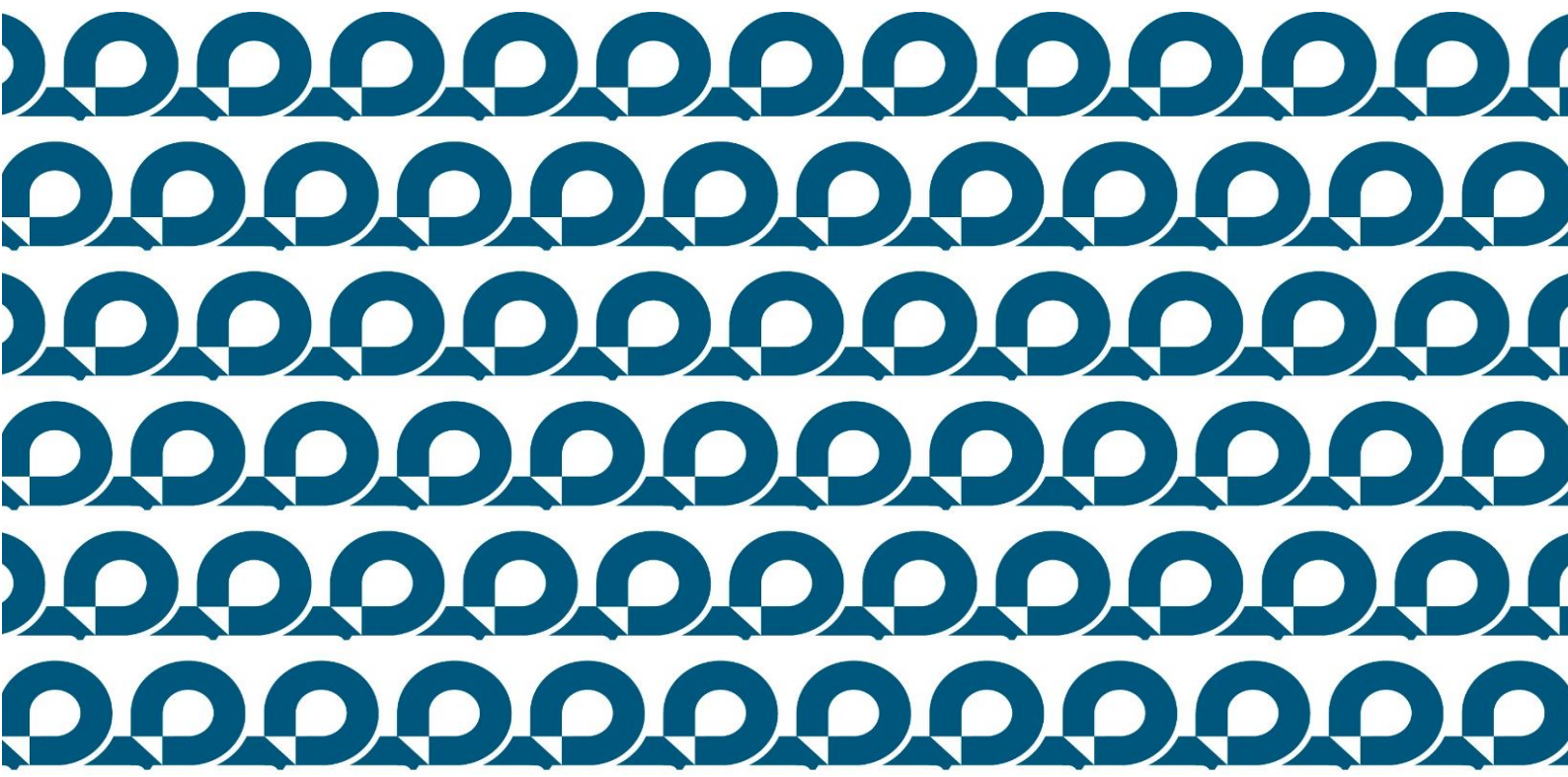


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Preamble

1. The Nueva Pescanova Group is a multinational business group engaged in the fishing, farming, processing and marketing of seafood products, especially fish and shellfish.
2. This is the DNA of the Nueva Pescanova Group:
 - a. Work to be the best food company in the market bringing the freshness of the sea to the consumer's table.
 - b. Rely on our brand and innovation to fish, farm, select and process the best product wherever it may be.
 - c. Our commitment to the sustainability of natural resources and of our partner communities, whose trust we build and maintain acting ethically and creating value.
3. The Nueva Pescanova Group has its own code of conduct and good business practices entitled "Our Code of Ethics", which in matters of Food Quality and Safety expressly states that:
 - a. The quality and excellence of the products provided by the Nueva Pescanova Group is one of its essential and strategic objectives.
 - b. The Group will only market products that comply with the guarantees established by legislation in terms of quality, composition and shelf life, sourcing from suppliers who hold the quality and food safety certificates established for this purpose.
4. This Corporate Policy on Food Quality and Safety of the Nueva Pescanova Group deems the integral observance of the principles established in "Our Code of Ethics" and in the rest of the provisions of our "Regulatory System of Corporate Governance and Compliance".
5. This Corporate Policy on Food Quality and Safety also relies on the prohibitions that, in matters of public health protection, are included in our Corporate Policy for the Prevention of Criminal Risks; and in a particular way is aligned with our Corporate Policy on Corporate Social Responsibility and, more specifically, with the commitments we assume therein in the pillar "Product".
6. The Nueva Pescanova Group, as reflected in this Corporate Food Quality and Safety Policy, assumes as its point of departure the principles of the most prestigious international Reference Systems and Certification Schemes and especially those recognised by the Global Food Safety Initiative (GFSI) and, as far as they may be related to the principles of food quality and safety, also those approved by the Global Sustainable Seafood Initiative (GSSI).
7. Finally, this Corporate Food Quality and Safety Policy of the Nueva Pescanova Group is compliant with the standards, guidelines and codes of practice of the CODEX ALIMENTARIUS of the Joint FAO-WHO Food Standards Programme.

Article 1. *Object and Purpose*

1. This Corporate Policy has the following object:
 - a. Define 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 provided by the Nueva Pescanova Group.
 - b. Contribute to the promotion of a Culture of Quality and Excellence, by means of the necessary communication, awareness and training so that all our professionals and collaborators acquire the commitment and actively participate in its achievement.
2. This Corporate Policy is a commitment to:
 - a. The Consumer and clients, as the foundation of our value offer, based on satisfying their needs and complying with their expectations.
 - b. Our products, in compliance with the strictest standards of food safety and quality; so that they are always healthy, nutritious and enjoyable.
 - c. The production processes of our value chain, which are made with the best available techniques and are based on efficiency and sustainability.

Article 2. *Scope of application*

1. This Corporate Policy must be complied with by all the companies and professionals of the Nueva Pescanova Group.
2. The Nueva Pescanova Group is made up of the Spanish company Nueva Pescanova, S.L., and all the Spanish and foreign companies controlled, directly or indirectly, by Nueva Pescanova, S.L.
3. By professionals of the Nueva Pescanova Group is understood all the directors, managers, authorised representatives and other professionals and employees of the Nueva Pescanova Group, in any part of the world and regardless of their type of contract.

Article 3. *Principles of Food Quality and Safety in the Nueva Pescanova Group*

Food Quality and Safety in the Nueva Pescanova Group are based on the following principles:

- a. **Focus on the Consumer/Client.**- In the Nueva Pescanova Group we work on an ongoing basis to exceed the expectations of our consumers/clients and provide the best value offer; striving to recognise their demands and needs in advance.
- b. **Commitment of the Top Management.**- The Top Management of the Nueva Pescanova Group assumes the task of conveying the importance of an efficient Food Quality and Safety management, facilitating the availability of the necessary resources, and ensuring that the expected results are obtained.
- c. **Involvement of the whole organization.**- All Group's professionals are aware of their responsibility with regard to Food Quality and Safety; and their participation and constant commitment to continuous improvement is encouraged.
- d. **Integration of our Suppliers in the System.**- Our suppliers are considered an essential part of our Quality and Food Safety Management System.
- e. **Risk Analysis.**- We understand that the correct determination of risks and opportunities allows us to prevent or reduce undesirable effects and increase desirable results.

- f. **Decisions based on evidence and data.**- We develop reliable and representative analyses of performance in the area of Food Quality and Safety in order to obtain data that provide the basis for decision-making.
- g. **Continuous Improvement (PHVA Cycle).**- We promote continuous improvement, resulting from the application of the PHVA Cycle - Plan, Do, Check, Act - in our daily work, seeking to make the Management System agile, flexible and adaptable to changes.
- h. **Training, information and awareness-raising.**- We dedicate the necessary resources to the correct training, education and awareness-raising in Food Quality and Safety of our professionals.
- i. **Transparency.**- The Nueva Pescanova Group will always act transparently with its Stakeholders, providing them with notable, adequate and precise information on the Quality and Safety of the processes, products and packaging.
- j. **Goals.**- We establish and communicate the goals regarding Quality and Food Safety aligned with the strategy of the Nueva Pescanova Group, in line with this Corporate Policy of Quality and Food Safety.
- k. **Uniqueness in the management of Food Quality and Safety.**- We proactively and efficiently incorporate all the principles of the Hazard Analysis and Critical Control Points (HACCP) of the Codex Alimentarius and other requirements of the References recognised by the Global Food Safety Initiative (GFSI), to all the products of the Nueva Pescanova Group regardless of where they are handled.

Article 4. Requirements of Food Quality and Safety in the Nueva Pescanova Group

The Nueva Pescanova Group's Food Safety and Quality System Requirements are the foundation on which our operations are set to guarantee the quality, safety and excellence of the manufactured and marketed products of the Group in any country or market; namely:

- a. **Training and protective clothing.**- All professionals and collaborators of the Nueva Pescanova Group - own, subcontractors and visitors - have the necessary equipment adjusted to the requirements identified in each case, proactively monitoring compliance with the established rules of personal hygiene and receiving training that ensures the correct performance of their duties.
- b. **Specifications.**- All products have their corresponding specifications, which are clear, complete, and precise; including, where appropriate, specific requirements set by our clients.
- c. **Validation and prior approval of the development and design of products.**- The development and design process of new products requires an approval phase that ensures the correct application of HACCP, the validation of their commercial life and adequate labelling in compliance with the legal requirements and, where appropriate, the inclusion of the requirements and specifications set by our customers.
- d. **Integration of Suppliers and Procurement.**- Our suppliers are one more element of our Quality and Food Safety System and a fundamental part of our guarantee of excellence; their selection must always and without exception obey the criteria set out in our internal rules on the Approval of Suppliers and Procurement Procedures.
- e. **Facilities and Equipment.**- The facilities comply with the technical and regulatory requirements necessary to guarantee the quality and safety of the products produced in them, and their equipment is suitably designed to perform safe, efficient and sustainable processes.

- f. **Cleaning, disinfection, pest control and waste disposal.-** At the Nueva Pescanova Group facilities where products are manufactured, there are appropriate Cleaning and Disinfection Plans, Pest Control Systems and Waste Disposal Procedures, in compliance with the regulations in force and the specific casuistry of each production unit, equipment, process and product manufactured.
- g. **Raw materials and containers and packaging.-** Our raw materials comply with the specifications agreed with our suppliers, in addition to scrupulously fulfilling the obligations of regulatory compliance in terms of Food Quality and Safety, and prior to their use in the production units, they must undergo the required reception controls, in accordance with the evaluation of potential risks to the Food Safety, Quality, Legality and Authenticity of the product.
- h. **Traceability.-** There is a traceability and batching system that allows to relate the manufactured products with the origin of the raw materials and packaging materials used in their production, as well as to know the details of their distribution to our customers.
- i. **Food Fraud.-** The Nueva Pescanova Group is particularly proactive, through the establishment of effective monitoring, supervision and control measures aimed at preventing and combating food fraud in any of its forms
- j. **Nutrition and Health.-** The nutritional value and the claims about the health benefits of our products are drawn up on the basis of the national and international recommendations established in this respect, following the guidelines of the bodies and institutions created for this purpose and the applicable regulations.
- k. **Consumer information and labeling.-** The labeling of our products is clear, complete, and truthful, always striving to provide our consumers with the most relevant and valuable information; emphasizing sensitive mentions to groups with specific food or nutritional needs (those who are allergic, intolerant, or others).
- l. **Food Defense.-** Our production centres regularly conduct the appropriate Hazard Analysis and Risk Assessment related to "Food Defence" to identify food safety vulnerable areas and determine the measures that need to be taken to protect against deliberate contamination or other acts of sabotage.
- m. **Consumer and Customer Service.-** The Nueva Pescanova Group has a Corporate Consumer and Customer Service System to speed up the process of capturing and internal dissemination of any enquiry, complaint or claim, to harmonise the actions undertaken and to provide the information that allows decisions to be taken aimed at improving the satisfaction of Consumers and Customers.
- n. **Inspection and Control.-** There are procedures and practices that verify the adequacy of production processes, raw materials and manufactured products according to the legal and technical specifications to which they correspond.
- o. **Corrective actions and analysis of opportunities (Preventive actions).-** In order to avoid the repetition of nonconformities, the Group has an adequate System of Corrective Actions and Opportunity Analysis.
- p. **Audits (internal and external).-** The Food Safety and Quality Systems of the Nueva Pescanova Group are verified through internal audits carried out by technicians with the required experience, as well as by certification bodies of recognised prestige.
- q. **Food crisis management.-** The action principles in situations of own or external food crises are co-operation and co-ordinated action, the adequacy and proportionality of the resources along the chain, the non-malicious or unfair use of such actions and proper,

transparent and loyal communication. In the Nueva Pescanova Group there are management, coordination and effective communication mechanisms to be executed in the event of an unforeseen event that may pose a threat to the health of the consumer and/or affect the reputation or credibility of the Nueva Pescanova Group, in order to minimise its possible adverse effects.

- r. **Product withdrawal.**- A Product Withdrawal Plan is available (immobilization, withdrawal, and/or recovery), which considers the development of a specific strategy in each case, and the peculiarities of each client and their own linear withdrawal systems.

Article 5. "Quality Excellence Pescanova" Program

In order to contribute to a better deployment of the Quality and Food Safety Function in the Nueva Pescanova Group, the "**Quality Excellence Pescanova**" Program is formally established, the pillars of which are as follows:

- a. Promotion of the Culture of Food Quality and Safety within the Group through:
 - Raising awareness and knowledge throughout the organization.
 - Monitoring all processes of the Value Chain; encouraging decision-making based on data.
 - Implementing a Global Reporting system based on significant KPIs.
 - Developing a training plan adapted to each of the levels and functions of the organisation.
- b. Ensuring the best Industrial and Operational Food Quality and Safety:
 - Ensuring the Food Safety of our products.
 - Developing the Constant Improvement of processes, services, and products.
 - Promoting Self-Checking of production processes of our Industrial Centers.
 - Shielding the Control of internal and external productions.
- c. Ensuring Superiority of Perceived Quality by the following stakeholders:
 - By the consumer; as the best product.
 - By the customer; as the best service.
 - By the organization.

Article 6. Governance and Management of Food Quality and Safety in the Nueva Pescanova Group

1. The Corporate Quality and Environment Management, part of the Corporate Operations Department of the Group, is responsible for setting the guidelines to establish the Quality and Food Safety Management Systems of the Nueva Pescanova Group and to check compliance with them:
 - a. Defining Food Safety and Quality standards.
 - b. Establishing the systematic evaluation of food risks and defining Control Plans.
 - c. Promoting the culture of Food Safety and Quality.
 - d. Leading the process of continuous improvement.
 - e. Setting and monitoring goals.
 - f. Establishing programmes and projects aimed at continuous improvement.

- g. Managing food crises.
 - h. Managing regulatory changes in Food Quality and Safety.
 - i. Managing inspections and requirements of the authorities and public administrations.
 - j. Managing Customer/Consumer Service and complaints.
 - k. Carrying out internal quality audits and inspections.
 - l. Carrying out and establishing the homologation and ongoing evaluation of suppliers.
 - m. Establishing the supervision of Control Plans.
 - n. Validating labelling and final artwork.
 - o. Controlling and managing Damages and Accidents.
 - p. Managing Laboratories.
2. The Directors of the Industrial Centres and other production and commercial units are chiefly responsible for the proper and efficient operation of the Food Safety and Quality System in their respective Centres
3. The Heads of Quality and Food Safety at the Industrial Centres, who report hierarchically to the Corporate Quality and Environment Management, are responsible for the management of Quality and Food Safety at each Industrial Centre in accordance with the guidelines set by the aforementioned Corporate Management, and must proactively and transparently provide the relevant information and report promptly whenever non-conformities and/or serious deviations occur.

Article 7. *Transparency and accountability*

- 1. The Corporate Quality and Environment Management shall report on its activity and results in the scope of this Corporate Food Safety and Quality Policy in a regular, truthful and transparent manner.
- 2. More specifically, the Corporate Quality and Environmental Management will provide information on its activity and results to the different stakeholders of the Nueva Pescanova Group through the following channels:
 - a. Annual Food Quality and Safety Report, to be submitted within the first three (3) months of each year to the COMEX of the Nueva Pescanova Group and to other governing bodies, as appropriate.
 - b. Inclusion of the relevant information on Food Quality and Safety in the corresponding sections of the Reports on the State of Non-Financial Information of the Nueva Pescanova Group, in accordance with the legal and good governance requirements.
 - c. Reports, memos or other relevant and applicable documents, which provide an assessment based on the corresponding relevant indicators. This information may be included in the corresponding Annual Activity Report of the Corporate Quality and Environment Management.
- 3. The dissemination of the Food Quality and Safety activities will be coordinated with the Corporate Communication and Institutional Relations Management and carried out by the

latter, in accordance with the Corporate Communication Policy, to whom the Corporate Quality and Environment Management will provide the contents to be adapted to the internal and external audiences through the different communication channels and tools of the Nueva Pescanova Group. The communications will be carried out with the collaboration and approval of the Corporate Management of Quality and Environment. For final approval, they will be submitted to the COMEX and/or CEO when necessary.

Article 8. Development and Control

The Corporate Director of Quality and Environment of the Nueva Pescanova Group is responsible for controlling the implementation, development and compliance with this Corporate Policy throughout the Group, as well as overseeing and coordinating the implementation of programmes or other Quality and Food Safety actions aimed at continuous improvement.

Article 9. Assessment

The Corporate Management of Quality and Environment will annually assess the compliance and effectiveness of this Corporate Policy and of the programmes and actions of Quality and Food Safety carried out in the Nueva Pescanova Group in the appropriate Annual Activity Report, which will be submitted to the Executive Committee (COMEX) of the Nueva Pescanova Group and to other governing bodies as appropriate.

Article 10. Dissemination, Training, and Communication

The Corporate Quality and Environment Management, in collaboration with the Corporate Communication and Institutional Relations Management, and in accordance with the Corporate Communication Policy, shall be responsible for the appropriate dissemination, training and communication actions to guarantee the effective knowledge of this Corporate Policy, as well as of any internal rule that develops the same, including its translation into the relevant languages within the Nueva Pescanova Group and its eventual dissemination and publication both through the corporate intranet PESCANET and on the corporate web pages, in the section corresponding to Food Quality and Safety.

Article 11. Revision and Changes

1. This Corporate Policy shall be reviewed periodically, and at least annually, by the Corporate Quality and Environment Management.
2. Any modification of this Corporate Policy shall be approved by the Executive Committee (COMEX) of the Nueva Pescanova Group, at the proposal of the Corporate Quality and Environment Chief Officer.

Article 12. Approval, Effective date, and Validity

1. The first version (v1) of this Corporate Policy on Food Quality and Safety was approved by the Executive Committee (COMEX) of the Nueva Pescanova Group at its Meeting held on 28 November 2019 at its head office in Chapela (Redondela - Pontevedra - Spain) and shall enter into force and be in force for the whole Nueva Pescanova Group as from that date.
2. The version in force at any time shall be the one duly consigned in the article "CONTROL OF MODIFICATIONS" of this document.

Article 13. *Modification Control*

Version	Summary of changes	Promoter of changes	Change approval body	Change approval date
v1	Initial approval of this Corporate Policy	Corporate R&D, Quality and Environment Chief Officer	COMEX	11/28/2019
v2	Organisational changes. Update from preamble to Article 7	Corporate Quality and Environment Chief Officer	COMEX	01/27/2021

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