



Report on RESPONSIBLE ACTION

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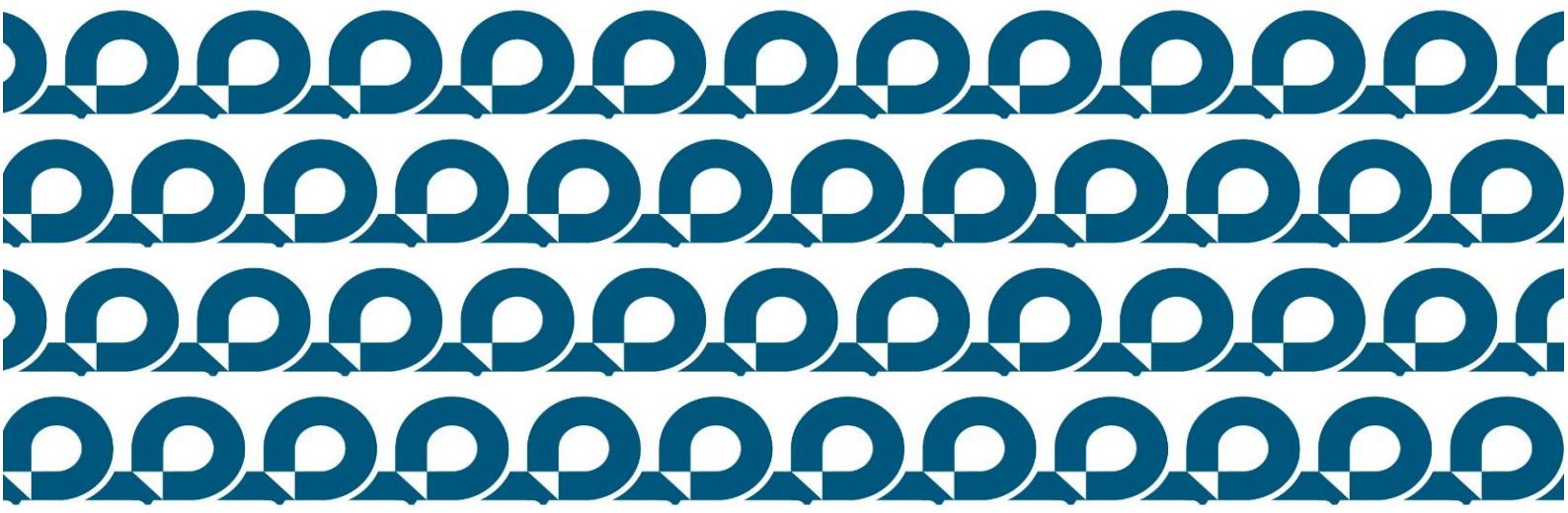


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August 2023

Global CSR Department

Executive summary

We, at the Nueva Pescanova Group, a group of companies engaged in fishing, aquaculture processing and commercialization of seafood products, are committed to our operations being carried out responsibly throughout the value chain.

The way we understand responsibility is built on our CSR Master Plan and its four pillars. Thus, in the reporting period A2022 – M2023, our Responsible Action Program (RAP) has identified a total of **1,259 responsible actions** in **13 group companies** located in **11 countries**, that represent 96.5% of the Group's headcount.

These 1,259 responsible actions are distributed among the four general plans linked to the 4 CSR pillars, the most relevant being 734 actions (58% of the total) that are linked to the "People First" and 367 to "Our Common Planet" pillars.

The three business divisions (fishing, aquaculture and processing) contribute to the Group's responsible action. Thus, of the 1,259 actions identified, 283 relate to the fishing division, 507 to the aquaculture division and 469 to the industrial activity, confirming our across-the-board commitment to responsible action.

As in the previous edition, we have grouped the responsible actions in 11 action platforms (4 Environmental, 5 Social 1 Sustainability, and Food Quality and Safety related) to which we have allocated the 1,259 responsible actions.

It is worth mentioning that 792 responsible actions on the social platforms contribute to: the prevention of occupational hazards; better health of employees; responsible and transparent labour relations; assurance of equality and diversity; training and talent management; and the improvement of the quality of life of the communities in which we are present.

It is also noteworthy that a total of 322 responsible actions are grouped in the environmental platforms contributing to the improvement of energy efficiency; transition to cleaner energy sources; and reduction of emissions to the atmosphere; responsible use of water; and the reduction of discharges ensuring its treatment; optimization of materials use; and waste reduction ensuring its correct management; as well as biodiversity protection and conservation.

These contributions confirm the Nueva Pescanova Group's commitment to the company's responsibility towards the planet, people, products and communities.

1. The Nueva Pescanova Group and its CSR Policy

The Nueva Pescanova Group is a Spanish multinational company specialized in the capture, cultivation, processing, and commercialization of seafood products. It was founded to revolutionize the fishing industry and bring the freshness of the sea to the consumer's table. With over 10,000 employees across three continents, we are present throughout the entire value chain, from origin to markets.

The responsible and sustainable development of our activities in their biological, environmental, technological, economic, commercial, and social dimensions is an undisputable and essential aspect of the corporate culture of the Nueva Pescanova Group, given that these activities involve the extraction and/or consumption of natural resources.

Our commitment to sustainable development is embedded in our DNA, based on *the sustainability of natural resources and the communities in which we operate, acting ethically, maintaining their trust, and creating value.*

In this context, we consider Corporate Social Responsibility (CSR) an essential element of the Nueva Pescanova Group's business strategy. The guiding principles, or pillars, that make up the Group's CSR Master Plan are **respect for the PLANET, the personal and professional development of the PEOPLE who form the Group, commitment to the markets through our PRODUCTS, and the contribution to the improvement of the quality of life of our partner COMMUNITIES** (Figure 1). Simultaneously, we ensure comprehensive adherence to principles of business ethics, institutional integrity, regulatory compliance, and the legal frameworks of the countries where we operate.



Figure 1. Guiding principles or pillars that make up the CSR Master Plan of the Group

In the Nueva Pescanova Group, we endorse the Sustainable Development Goals (SDGs) of 2030 Agenda of the United Nations (UN), of which we are part, as participants, through the Spanish Network of the UN Global Compact.

We have aligned our CSR strategy with the priorities raised by our stakeholders in the preparation of the materiality assessment.

To intensify the dialogue with stakeholders, since 2018 and every two years the CSR Department undertakes a materiality assessment, incorporating to our analysis several issues that are essential for our stakeholders and with an impact on our fishing, aquaculture, processing and commercial activities.

Thus, in the last quarter of 2022, we started the materiality assessment process taking as a starting point the 27 relevant aspects assessed and considering that all of them are important. From their prioritization, the material aspects that stand out are: 13 material aspects stand out for their materiality, highlighting for their relative value the aspects of guaranteeing food safety and quality of our products and the safety and health of our workers, as well as 2 essentials for our activity: responsible fishing and aquaculture and sustainable

fishing and aquaculture. Of the remaining material aspects, 4 environmental aspects focused on the use of energy, efficiency and circular economy, carbon footprint and biodiversity stand out; 2 aspects of labour responsibility and decent work; 2 aspects related to process and product traceability and packaging sustainability, and 1 aspect to strengthening the Group's internal governance.

The 2021 Materiality Assessment report is available at <https://www.nuevapescanova.com/en/>

2. Responsible Action Program (RAP)

Based on the CSR Master Plan, its 4 pillars and the CSR and Sustainability Corporate Policies, we have developed a Responsible Action Programme (RAP), whose main objective is to identify, measure and steer the Group's responsible performance, as well as to know its contribution to sustainable development.

The RAP documents the work of the Group's companies in generating shared value with their stakeholders. Through responsible action, in the Nueva Pescanova Group we contribute to the social, economic, and environmental sustainability of our environment in the countries and communities where we are present.

2.1. Components of the Responsible Action Programme

The RAP rests on the pillars of the Group's CSR – Planet, People, Product and Communities, and consists of four tiers:

- **PILLAR** tier: It is the top level on which the CSR Policy and the RAP itself are designed. Each of the 4 pillars of the Nueva Pescanova Group's CSR is linked to a **GENERAL PLAN**.
- **MATERIAL ASPECT** tier: From the 4 CSR pillars and each of the General Plans, hang aspects of material aspects linked to **SPECIFIC PLANS**.
- **PROJECT** tier: Is the set of actions designed in the framework of each of the specific plans linked to a materiality aspect? Each project is related to a specific theme and scope, and each specific plan can relate to more than one project.
 - *Theme*: Defines the specific action topic on which each project is based, these are specific and answer to the materiality aspect to which they are linked.
 - *Scope*: Defines the scope of action of each theme and provides a greater detail in the definition of foreseen actions, nailing down the design of the project. Projects may have more than one scope if necessary.
- **ACTION** tier: Is the variation of the projects in each of the companies, industrial centres, or workplaces for the different activities of the Group. Each project may be linked to several actions, segregating these by country/company, industrial or workplace.

The Responsible Action Program is arranged with a tree structure, where each general plan is the “trunk” and the specific plans represent the main branches, whilst their projects and actions are the “secondary branches” and leaves respectively (Figure 2).

This structure is transferred to the tool of the CSR Responsible Action Program that allows to inventory, document and measure all the responsible actions being performed in the business division and company he/she represents.

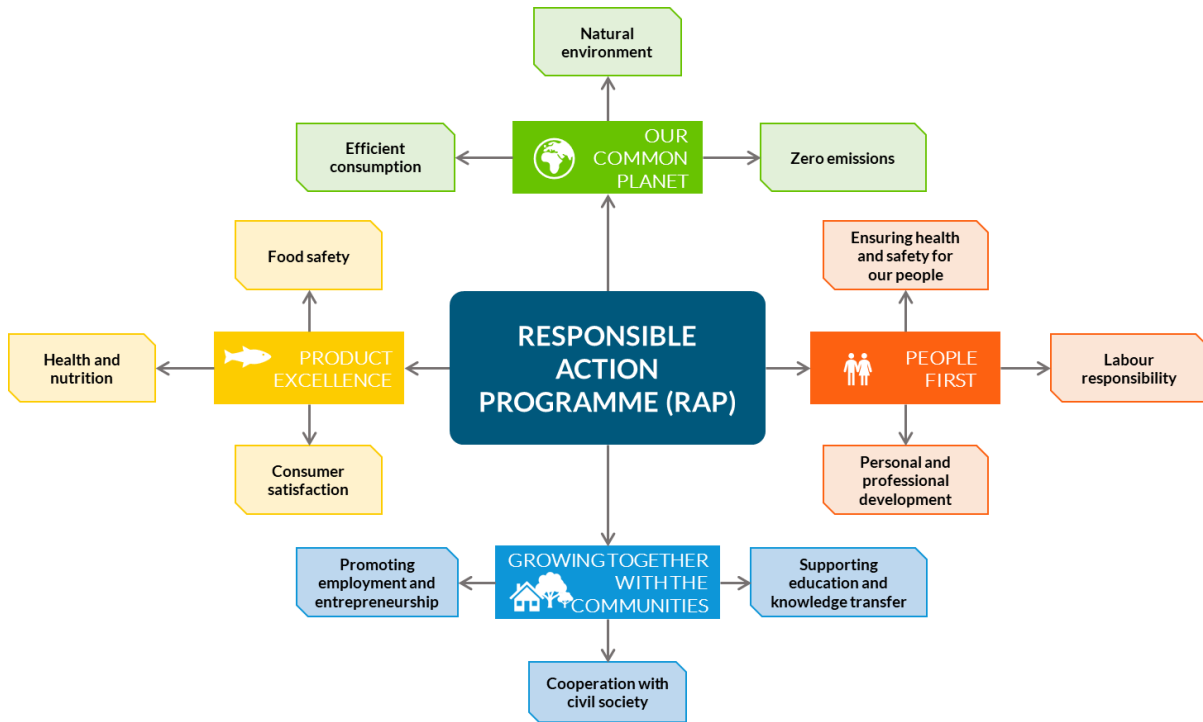


Figure 2. Structure of the A2022-M2023 RAP identifying the 4 General Plans and their Specific Plans.

2.2. The A2022-M2023 Responsible Action Program

2.2.1. Scope

After the first identification and measurement of 226 responsible actions in four countries back in 2018, the 2019 RAP continued with the identification and measurement of 668 responsible actions carried out by Group companies in 8 countries. In 2020 the RAP was extended to cover, transversally, 100% of the business divisions and companies of the Nueva Pescanova Group.

In the A2021-M2022 edition, the scope of the RAP is 100% of the business divisions and companies of the Nueva Pescanova Group, with the addition of the PESCANOVA BIOMARINE CENTER inaugurated in November 2021.

In this edition for the reporting period A2022-M2023, we have focused on the fishing, aquaculture and processing divisions of the Nueva Pescanova Group. The report covers the responsible actions performed by 13 companies that represent 96% of the Group's headcount.

As for the geographic scope, we have analysed the responsible actions of the Group companies in 11 countries: Angola, Argentina, Ecuador, Spain, France, Guatemala, Ireland, Mozambique, Namibia, Nicaragua, and Peru (Figure 2).

Of the activities of the Group in these countries, we differentiate primary or harvesting activities (fishing and aquaculture) in Africa and Latin American countries, and secondary or industrial activities with a higher presence in Spain.

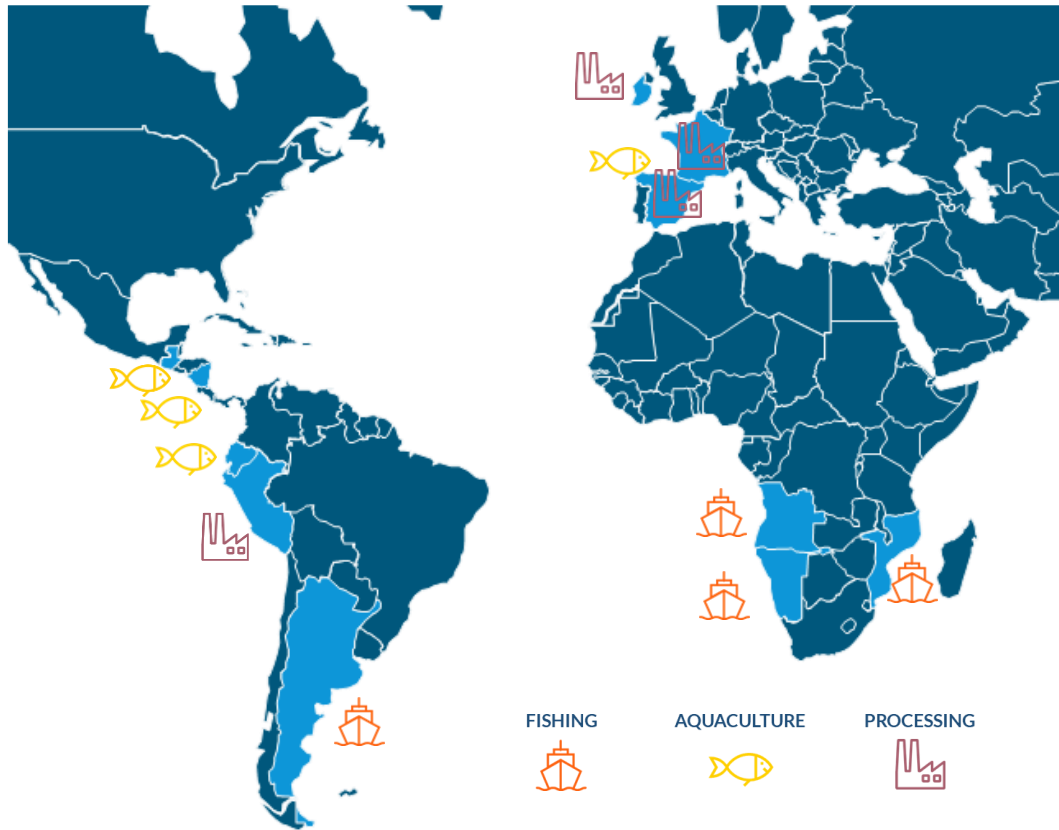


Figure 3. Geographic scope of the A2022-M2023 RAP.

2.2.2. Methodology

In this edition, the process for gathering information was two-fold: to ensure the gathering of all responsible actions and their standardization and make easier the work for the CSR ambassadors.

To achieve the first of these objectives, we followed the methodology of the previous edition but updated the RAP Dashboard tool with a better questionnaire of 111 questions grouped by pillars aimed at gathering 100% of the Group's responsible actions. Furthermore, the questionnaire also included relevant aspects, which even when they are not considered material, are aspects the Group addresses.

To achieve the second of these objectives, the gathering of information is done through an in-depth interview with the CSR ambassadors, with the CSR team transferring the information to the Excel tool. Subsequently, the completed file is sent to the CSR ambassadors for review and approval, before moving on to the final phase, i.e., the measurement of the impact of each of the responsible actions that are quantifiable.

The 4 general plans into which each action is classified are: 'Our Common Planet' linked to the **PLANET** CSR pillar, 'People First' linked to **PEOPLE**, 'Product Excellence' linked to **PRODUCT** and 'Growing together with the Communities' linked to **COMMUNITIES**.

3. A2022-M2023 RAP RESULTS

3.1. Number of Responsible Actions.

The Responsible Action Program, A2022-M2023 RAP, has identified a total of 1,259 responsible actions in 13 Group companies located in 11 countries.

3.1.1. By general plan

Figure 4 shows the number of responsible actions classified by general plans:



Figure 4. Number of responsible actions in each general plan in the A2022-M2023 RAP.

3.1.2. By type of activity and country

The Nueva Pescanova Group has put together a vertical value chain in the seafood sector. The activities go from harvesting, wild caught or farmed seafood, moving on to processing to end with the sale of finished products.




The RAP, whose nature es transversal, includes in this A2022-M2023 edition the responsible action by documenting actions in the following Group's activities: fishing, aquaculture, and processing. Thus, this RAP includes the actions in the Fishing division; in the Aquaculture division; and in the Processing division, which in turn are broken-down by company and workplace (Table I).

3.2. Responsible Action Platforms and Impact Measurement

For better clarity in the analysis of results, we have grouped the responsible actions into Performance Platforms by their scope.

We define Performance Platform as the grouping of a series of responsible actions around the same theme and with an equivalent scope. In this edition we have 11 platforms: 4 related to the environment, 5 to social issues, 1 to sustainability, and 1 to food quality and safety. Once the 11 Platforms were defined, we allocated the 1,259 responsible actions identified to each Performance Platform. It is noted that 792 responsible actions are linked to Social Platforms y 322 to Environmental Platforms (Figure 5).

Table I. Number of responsible actions by activity, country, and workplace (*).

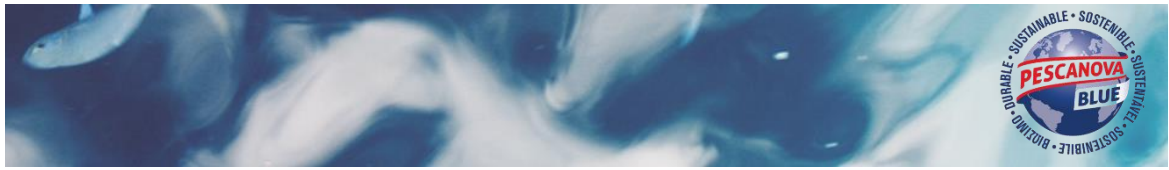
ACTIONS COUNTER (Country and activity)			
No. actions	Activity	Company-Country	No. actions
283	 FISHING	ARGENOVA - Argentina	56
		P. LOBITO - Angola	36
		NOVANAM - Namibia	131
		PESCAMAR - Mozambique	60
507	 AQUACULTURE	CAMANICA - Nicaragua	127
		INSUIÑA - Spain	84
		BIOMARINE - Spain	42
		NOVAGUATEMALA - Guatemala	76
		PROMARISCO - Ecuador	178
469	 PROCESSING	EIRANOVA - Ireland	33
		NUEVA PVA FRANCE - France	100
		PVA ESPAÑA - C.I.Arteixo	57
		PVA ESPAÑA - C.I.Chapela	64
		PVA ESPAÑA - C.I.Catarroja	51
		PVA ESPAÑA - C.I.Paterna	52
		PVA ESPAÑA - C.I.Porriño	70
		NOVAPERÚ - Peru	42
1259		TOTAL	1259

 ENVIRONMENTAL	322	 SOCIAL	792
Energy	71	OHS and health	214
Water	104	Labour relationships	241
Materials	115	Equality and Diversity	140
Biodiversity	32	Training and talent management	123
		Social action and humanitarian aid	74
 SUSTAINABILITY	89		
 QUALITY AND FOOD SAFETY	56		
- TOTAL 1,259 ACTIONS -			

Figure 5. Number of responsible actions by platform.

The 11 platforms are presented next, with a description of the most significant examples.

3.2.1. Environmental Platforms – SUSTAINABILITY



In the Sustainability Platform we have grouped all the projects and actions which, from one end to the other end of our activities contribute to gather sustainability evidence according to our 'Pescanova Blue' Program (*) in the areas of sustainable sourcing, labour responsibility, responsible operations, responsible relationships, ethical behaviour, and compliance.

(*) The Corporate Policy on Sustainability is available at <https://www.nuevapescanova.com/en/>

In this platform we have undertaken a total of 89 actions in 13 Group companies in 11 countries that we have grouped following the Pescanova Blue principles. The most remarkable being the following:

a. Sustainable sourcing

Our aim is that the species we fish, farm or purchase must evidence a sustainable origin and responsible processing.

- GLOBALG.A.P. (Good Agricultural Practices) Certification to PROMARISCO; and INSUÍÑA.
- BAP (Best Aquaculture Practices) Certification to PROMARISCO; CAMANICA and NOVAGUATEMALA.
- ASC (Aquaculture Stewardship Council) Certification to PROMARISCO and CAMANICA.
- ASC/MSC CoC certification to 12 plants: I.C. Arteixo, I.C. Chapela, I.C. Porriño, I.C. Paterna and I.C. Catarroja of PESCANOVA ESPAÑA, I.C. Lorient and I.C. Boulogne of NUEVA PESCANOVA. FRANCE, NOVAGUATEMALA; CAMANICA and PROMARISCO, and the processing plants in Walvis Bay and Lüderitz of NOVANAM.
- The Namibian Cape Hake (*Merluccius capensis* and *Merluccius paradoxus*) is MSC certified, NOVANAM's fleet is within the scope of that certification as it belongs to the *Namibian Halke Association*.
- The Group participates in 3 Fishery Improvement Projects (FIP): toothfish (*Dissostichus eleginoides*) Argentine Red Shrimp (*Pleoticus muelleri*) in Argentina (through ARGENOVA) with a FIP estimated catch of 3,766 t and 80,000 t respectively; and Mahi-Mahi (*Coryphaena hippurus*) in Peru with a FIP estimated catch of 41,430 t.

b. Labour responsibility

The people that are employed by Group companies must benefit from a legal, fair and decent work, formalized and evidenced by a valid employment contract in agreement with applicable legislation.

- SMETA/SEDEX Certification of the subsidiaries NOVAGUATEMALA (4 pillars); PROMARISCO and NOVAPERU (2 pillars).
- GRASP (GLOBALG.A.P. Risk Assessment on Social Practice) module Certification of I.C. Xove of INSUÍÑA and PROMARISCO.
- ISO 45001 Certification of PESCANOVA BIOMARINE CENTER.

- 5Z Excellence Certification of I.C. Arteixo, I.C. Catarroja, I.C. Paterna and I.C. Porriño of PESCANOVA ESPAÑA and I.C. Mougás and I.C. Xove of INSUÍÑA.
- FISH (*Fairness, Integrity, Safety and Health*) Standard for Crew Certification of the subsidiary company NOVANAM that ratifies the excellence of its labour standards on board the 10 vessels fishing in that country,

c. **Responsible Operations**

Our products must evidence some beneficial effect for the health of consumers, through an approach of continuous improvement in their formulations, in addition to guaranteeing strict compliance with the legislation on quality and food safety.

- IFS-Food (*International Featured Standards*) to the 5 industrial centres of PESCANOVA ESPAÑA, i.e., I.C. Arteixo, I.C. Chapela, I.C. Porriño, I.C. Paterna and I.C. Catarroja; I.C. Lorient and I.C. Boulogne of NUEVA PESCANOVA FRANCE; NOVAGUATEMALA; CAMANICA and PROMARISCO and the processing plants in Walvis Bay and Lüderitz of NOVANAM.
- BRC (*British Retail Consortium*) Certificate to the processing plant of NOVAPERU (Peru); and ARGENOVA (Argentina).
- HACCP (Hazards Analysis and Control of Critical Points) Certificate to ARGENOVA (Argentina).
- ISO 14001 – Environmental Management System (EMS) Certificate to the I.C. Arteixo, I.C. Chapela, I.C. Paterna and I.C. Porriño of PESCANOVA ESPAÑA S.L.U. (Spain); and I.C. Mougás and Xove of INSUÍÑA (Spain).
- EMAS (*Eco-Management and Audit Scheme*) Certificate to INSUÍÑA's I.C. Mougás (Spain)
- BIO Ecological/Organic Production Certification to I.C. Arteixo and I.C. Porriño of PESCANOVA ESPAÑA.
- ELS (European Licensing System | FACE (Spanish Coeliac Society) Certification for gluten free products to I.C. Arteixo, I.C. Chapela and I.C. Porriño of PESCANOVA ESPAÑA.
- HALAL Certification, to I.C. Porriño of PESCANOVA ESPAÑA.
- SAE (*Self-control System for the export of food products for human consumption to third countries*) Certification to I.C. Chapela and I.C. Porriño of PESCANOVA ESPAÑA.
- BASC (*Control and Security Management System*) Certification to PROMARISCO and NOVAPERÚ.
- ISO 9001 Certification, for salvage, to PESCAMAR's shipyard.
- REPAK Certification to EIRANOVA
- BREEAM Certificate (Environmental standard measuring sustainability of buildings) to PESCANOVA BIOMARINE CENTER.

d. **Animal welfare**

- Survival rates in the grow-out farms of PROMARISCO, NOVAGUATEMALA, CAMANICA and I.C. Xove of INSUÍÑA.
- Survival rates in the hatcheries/nurseries of PROMARISCO, NOVAGUATEMALA, CAMANICA and I.C. Mougás of INSUÍÑA.

3.2.2. Environmental Platforms - ENERGY



In the Energy Platform we have grouped all the projects and actions which, from one end to the other end of our activities contribute to energy efficiency, the transition to cleaner energy sources and the reduction of emissions to the atmosphere.

a. Improved energy efficiency

The energy efficiency indicator in this reporting period was 2.78 MWh/t produced down from 3.63 in the previous reporting period, which represents a 23% reduction (*cf.* Report on the Non-Financial Statement 2023, <https://www.nuevapescanova.com/en/communication/annual-reports/>).

This improvement is supported by measures taken such as equipment renewal and maintenance plans, as well as the implementation of new processes from improving energy efficiency, in terms of lower kWh, and a reduction in the use of fossil fuels:

- New pumps in the grinders that allow the production of more kilograms of product in I.C. PORRIÑO, of PESCANOVA ESPAÑA.
- Replacement of old equipment by more efficient equipment (new compressor and pump variator of the hydraulic power station) in I.C. Porriño of PESCANOVA ESPAÑA.
- Installation of a heat recovery circuit at the cooking facilities of I.C. Lorient of NUEVA PESCANOVA FRANCE
- Installation of electronic thermostatic valves on board the Antares IV of PESCAMAR for temperature control optimizing the consumption of electricity.
- Installation of racks (vertical storage structures) in the cold stores of NOVAGUATEMALA which allows to increase the storage capacity.
- Progressive change of luminaires to LED in I.C. Paterna of PESCANOVA ESPAÑA, in the I.C. Boulogne and I.C. Lorient of NUEVA PESCANOVA FRANCE, in PROMARISCO's processing plant and in the shipyard and on board the Antares IV and Efripel I of PESCAMAR.
- Increased control of sea water used for rearing tanks that reduces the need to pump water and is evidenced in lower electricity consumption in the I.C. Xove of INSUÍÑA.
- In the I.C. Mougás of INSUÍÑA, an intelligent management system of electrical resistances is being implemented to heat the water in larvae rearing that allows to improve energy efficiency.
- In NOVAPERÚ a code of good practices has been implemented that includes, among other, the adjustment of the cold-store temperature, keep doors closed to avoid cold leaks, turning off of lights whenever they are not necessary, shutdown the waste room whenever it is empty.
- Change of the gas boiler that now uses the waste heat generated in the engine room for water heating in the I.C. Porriño of PESCANOVA ESPAÑA.
- New gas boilers with higher performance in PESCANOVA BIOMARINE CENTER.

b. Transition to cleaner energy sources

Electricity from renewable sources used in the reporting period was 59,264 MWh which represents 37% of total electricity used.

Electricity from renewable sources is linked to:

- Energy produced by the photovoltaic solar panels in NOVANAM (I.C. Lüderitz and I.C. Walvis Bay), as well as in PESCANOVA ESPAÑA S.L.U. (I.C. Porriño, I.C. Arteixo, I.C. Chapela, I.C. Paterna and I.C. Catarroja); INSUÍÑA (I.C. Xove); and PESCANOVA BIOMARINE CENTER.
- The acquisition of electricity from renewable sources in PROMARISCO, PESCANOVA ESPAÑA (I.C. Porriño, I.C. Arteixo, I.C. Chapela, I.C. Paterna and I.C. Catarroja); INSUÍÑA (I.C. Xove and I.C. Mougás); PESCANOVA BIOMARINE CENTER and EIRANOVA

c. Reduction of GHG emissions to the atmosphere

The Nueva Pescanova Group aims to reduce its carbon footprint (scopes 1 and 2) by 3% per year, aiming for a cut of 30% by 2030 and 50% by 2040, starting from the 2020 baseline. The Group's activities reduced GHG emissions (scope 1 and 2) by 7.1% over the previous reporting period (ref. 2023 Report on Non-Financial Statement, www.nuevapescanova.com/en/communication/annual-reports/). Such reduction is supported by responsible actions, among which we highlight:

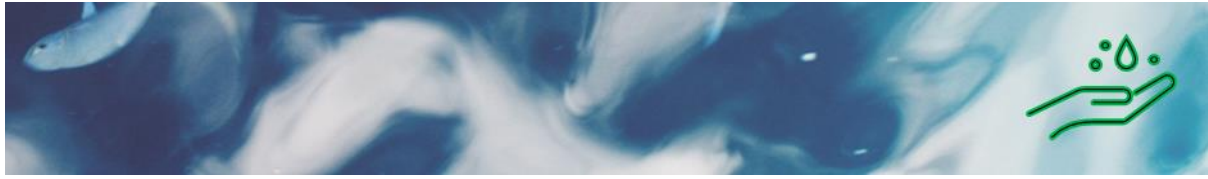
- Preventive maintenance of refrigeration equipment and equipment renewal to allow the reduction of refrigerant gas leaks and the non-emission of greenhouse gases into the atmosphere. We highlight the change of the cooling equipment in the R+D room of the I.C. Chapela of PESCANOVA ESPAÑA, the installation of a new compressor and evaporators for the raw material rooms in NOVAGUATEMALA and the changes of pipes in PROMARISCO.
- Change of refrigerant to another with less greenhouse effect in I.C. Chapela through the renewal of the equipment of the R+D room replacing R422D by R 449A, in I.C. Boulogne changing from R404 and R134 to R744 (CO₂) exclusively, in the NOVANAM fleet we changed from Freon gas R22 to R417A, change that is also being carried out, gradually, in the processing plant and offices of PROMARISCO.
- Change from diesel to natural gas in the boiler of the I.C. Arteixo of PESCANOVA ESPAÑA and the PESCANOVA BIOMARINE CENTER.
- Use of waste compactors in PESCANOVA ESPAÑA (in I.C. Arteixo, I.C. Chapela, I.C. Porriño, I.C. Catarroja and I.C. Paterna), INSUÍÑA (I.C. Xove), PESCANOVA BIOMARINE CENTER, NUEVA PESCANOVA FRANCE (in I.C. Boulogne and I.C. Lorient) and EIRANOVA.

d. Environmental offset program

The Nueva Pescanova Group aims to gradually offset emissions (scope 1 and 2), towards a net zero emission target by 2040 in combination with the emission reduction effort. The Group has actions for the sequestering and storage of CO₂, through which a total of 13,212.2 tCO₂ have been sequestered, which represents 4.2% of the Group's scope 1 and 2 emissions (ref. 2023 Report on Non-financial Statement, www.nuevapescanova.com/en/communication/annual-reports/).

- By planting mangroves (*Rhizophora* spp.) in PROMARISCO and CAMANICA.
- Care and maintenance of teak forest (*Tectona grandis*) in an area of 126 ha CAMANICA.
- Nursery garden in CAMANICA. The plants are grown on company land and then handed over for planting in other areas at risk of deforestation.

3.2.3. *Environmental Platforms - WATER*



In the Water Platform we have grouped all the projects and actions which, transversally, contribute to improve the responsible use of water, through a better efficiency of water used, the use of water from alternative sources and the reduction of effluent by ensuring its treatment.

The most relevant responsible actions in this platform are shown below:

a. Improved water use efficiency

- Reverse osmosis process fitted in I.C. Porriño of PESCANOVA ESPAÑA by which the wastewater from the treatment plant is reused for the cooling towers, thus reducing the use of groundwater.
- In I.C. Arteixo of PESCANOVA ESPAÑA, replacement of cleaning chemicals by others that allow the reduction in the number of feedings to the cooking line, thus reducing water consumption.
- The implementation of an electronic system that controls the water level of the evaporative condensers allows to optimize water consumption in I.C. Chapela of PESCANOVA ESPAÑA.
- In I.C. Paterna of PESCANOVA ESPAÑA, the optimization of cod desalting process allows to reduce the number times to change water with the consequent reduction of water consumption and discharge.
- The PESCANOVA BIOMARINE CENTER makes responsible use of water through a recirculation system.
- In the NOVAPERU processing plant, the new machinery installed allows the optimization of water consumption throughout the process. In addition, we have installed flowmeters that will allow to know the places where consumption is higher to later design improvement actions.
- the I.C. Boulogne of NUEVA PESCANOVA FRANCE, the production schedule has been improved, which limits the use of certain lines and therefore optimizes water consumption.
- In I.C. Lorient of NUEVA PESCANOVA FRANCE, the control of consumption through meters allows to establish measures for the optimization of water consumption.
- The water leak elimination plan maintained at NOVAGUATEMALA processing plant optimizes water consumption both in the product manufacturing process as well as in sanitary services.
- The replacement of metal tanks by fibre tanks, to avoid water pollution from oxide residues, in PROMARISCO processing plant allows a responsible use of water "extending the useful life" of water resources.
- The use of foam-forming liquids in the NOVANAM's I.C. Lüderitz guarantees an optimal use of water.
- Water purification plants, by evaporation, have been installed in 20% of the PESCAMAR fleet, reaching 100% this year.
- Carrying out awareness campaigns for employees in the different industrial centres on the responsible use of water. These actions were carried out in PESCANOVA ESPAÑA (in I.C. Arteixo, I.C. Catarroja, I.C. Paterna and I.C. Porriño), NUEVA PESCANOVA FRANCE (in I.C. Boulogne and I.C. Lorient), NOVANAM in the fleet, NOVAPERU and in the processing plant and hatcheries/nurseries of CAMANICA, PROMARISCO and NOVAGUATEMALA.

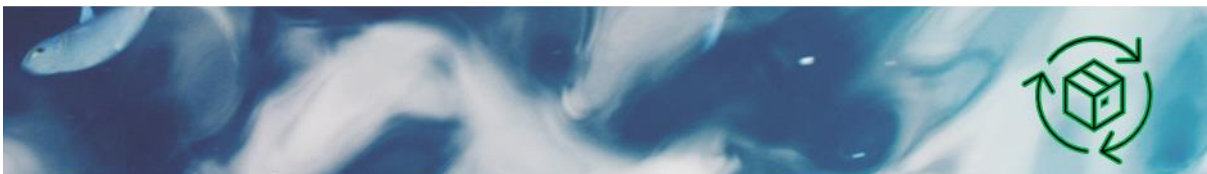
- Use of water from alternative sources that allow not to consume fresh water from usual water resources.
 - Seawater:
 - In the hatcheries/nurseries of CAMANICA we have installed a desalination plant that uses seawater for service activities such as bathrooms, washing floors, etc.
 - Our entire fleet has water treatment plants on board that generate fresh water for the daily work of the ship avoiding the supply of fresh water at port.
 - Rainwater.
 - In the facilities of PESCAMAR we have a tank for the collection of rainwater that is used in bathrooms, workshop and for cleaning tasks.

b. Effluent management

Aware of the environmental impact of effluent discharges, at the Nueva Pescanova Group we work on preventive measures and responsible management of the same via different projects we have implemented. The most remarkable related responsible actions are shown below:

- Installation of own industrial wastewater treatment plants in I.C. Porriño, I.C. Arteixo, I.C. Chapela, and I.C. Paterna of PESCANOVA ESPAÑA, I.C. Xove and I.C. Mougás of INSUIÑA, PESCANOVA BIOMARINE CENTER, Puerto Deseado ARGENOVA, I.C. Lüderitz of NOVANAM, NOVAPERÚ, processing plant of PROMARISCO and the hatchery/nurseries and processing plant of CAMANICA. The new fishing vessels are all equipped with treatment plants. The fleet of ARGENOVA has improved effluent quality with a new filtering equipment added to the treatment system.
- Delivery of effluent to an authorized waste management provider in 100% of the companies that generate it.
- 100% of our fleet has implemented an Anti-Spill Action Protocol for the prevention of spills into the marine ecosystem and, if any, establish the appropriate measures to minimize their impact.
- Sludge recovery for:
 - Obtaining biofuel in PESCANOVA ESPAÑA (I.C. Arteixo, I.C. Chapela, I.C. Porriño); INSUIÑA (I.C. Xove); NUEVA PESCANOVA FRANCE (I.C. Boulogne); and PESCANOVA BIOMARINE CENTER.
 - Processing of organic manure. In PESCANOVA ESPAÑA (I.C. Chapela and I.C. Paterna); and INSUIÑA (I.C. Mougás).

3.2.4. Environmental Platforms – MATERIALS



In the Materials Platform we have grouped all the projects and actions which, transversally, contribute to optimize the use of materials, the recovery of sub-products and the reduction of waste ensuring a proper management.

a. Efficient use of raw materials

The optimization of raw material consumption is carried out by the implementation of new equipment or processes, the following are the most notable:

- Installation of a machine for processing PESKITOS with a better yield of raw material in I.C. Porriño of PESCANOVA ESPAÑA.
- Increased yield of raw material by searching alternatives for the sale of products such as raw Norway lobster heads for a soup processing company in EIRANOVA
- Workshops for improving line 2 of surimi processing to increase the yield in I.C. Chapela of PESCANOVA ESPAÑA.
- Better use of the raw material through working groups that make the kg of raw material profitable through products with more added value in the I.C. Catarroja and Paterna of PESCANOVA ESPAÑA.
- Implementation of a diagnosis of pathologies by PCR that allows us to anticipate and take corrective actions in C.I Xove of INSUÍÑA.
- Change of the type of feed and more efficient supply which allows greater performance in the I.C. Mougás of INSUÍÑA. In addition, a larval culture protocol has been developed that improves survival rates and therefore increases yield.
- Reduction of transfer times in the processing plant to avoid shrimp dehydration and improve the performance of the raw material in the NOVAGUATEMALA processing plant.
- Improvement of the process in CAMANICA's processing plant avoiding raw material falling to the floor in the grading area.
- Optimization of the production process on board the Antares IV and the Efripel I that allows a better yield of the raw material in PESCAMAR.
- Improvement of hake yield in NOVANAM's I.C. Walvis Bay, thanks to the continuous monitoring of the processing process that allows generating KPIs that help minimize losses.

The Nueva Pescanova Group works in the gradual use of recyclable, reusable and compostable material in the packaging of Nueva Pescanova Group products. On this subject, we highlight the following actions:

b. Upcycling of sub-products

The Group encourages circular economy actions for sub-products from fisheries and aquaculture. Thus, we have solutions for the upcycling of sub-products from our fishing, aquaculture and processing activities, incorporating those sub-products to different industries to obtain a new solution. The following actions should be highlighted:

- Reduction to fishmeal and derivatives: In our processing plants in NOVANAM; PESCANOVA ESPAÑA (I.C. Arteixo, I.C. Chapela, and I.C. Porriño); EIRANOVA; ARGENOVA; PROMARISCO; CAMANICA; and NOPVAPERÚ sub-products are sent to third parties for their reduction to fishmeal and derivatives.
- Production of organic compost: In I.C. Lorient of NUEVA PESCANOVA FRANCE, organic waste, mainly shrimp shells and heads, is recovered to produce compost.
- Production of biogas: in I.C. Boulogne of NUEVA PESCANOVA FRANCE organic waste is sent to a authorized waste management provider for the production of biogas.

c. Waste reduction and management

The waste generated by the fishing, aquaculture and processing activity of the Nueva Pescanova Group is classified, segregated and managed by working with authorized waste management providers who are

responsible for their proper treatment. Likewise, there are actions aimed at reducing the amount of waste generated.

In this respect, the most remarkable actions are:

- Aimed at reducing waste generation, different measures have been implemented, among which we highlight: installation of a new *Peskitos* processing machine to obtain better yield of the raw material and minimizes organic waste in the I.C. Porriño of PESCANOVA ESPAÑA; in the I.C. Walvis Bay the packaging used for purchased raw material is reused; in the hatcheries/nurseries of PROMARISCO controls are carried out to avoid overfeeding and in this way the consumption of the feed is optimized, minimizing waste; reuse of chlorine containers in CAMANICA.
- 100% of the companies included in this report have a procedure for the management and handling of hazardous waste and subsequent delivery to an authorized waste management provider.
- Awareness campaigns were carried out for the correct management and reduction of waste in for the workers of PROMARISCO, PESCANOVA ESPAÑA (in I.C. Porriño, I.C. Arteixo, I.C. Catarroja and I.C. Paterna), INSUÍÑA (in I.C. Xove and I.C. Mougás), NUEVA PESCANOVA FRANCE, ARGENOVA, NOVAGUATEMALA, I.C. Walvis Bay and fleet of NOVANAM and in CAMANICA.

3.2.5. Environmental Platforms –BIODIVERSITY



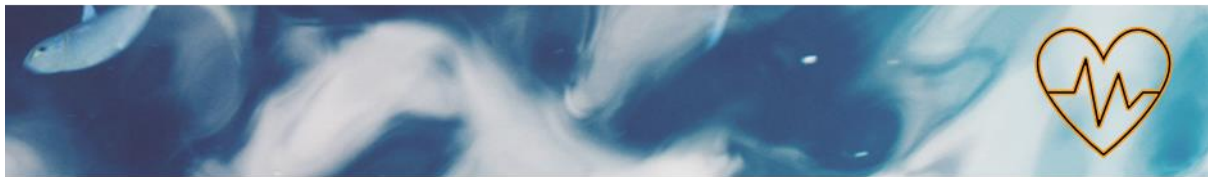
In the Biodiversity Platform we have grouped all the projects and actions which, transversally to our activities, contribute to biodiversity protection and preservation. This, in this platform we have undertaken 32 responsible actions in 7 countries.

The following are the most notable actions:

- Project for iguanas (*Iguana iguana*) preservation that includes the rearing of this species in nurseries located in the facilities of CAMANICA for the release of newborn iguanas in cooperation with the local authorities of the Ministry of Environment and Natural Resources (MARENA). In the last reporting period 310 iguanas have been released, reaching 2,110 iguanas since the beginning of this project back in 2016.
- Implementation of the use of *tori lines*: the fishing activity entails environmental impacts as the accidental catch of seabirds. Aware of this impact, the Group has been pioneering in the design and use of *tori lines* on board its vessels to avoid incidents with these birds. This equipment has been fitted on-board all the vessels where the interaction with seabirds there is high and therefore is risk of incidents, as it is the case in Argentina (*tori lines* were fitted on board 13 vessels, 100% of ARGENOVA's fleet) and in Namibia (on 9 vessels, 100% of NOVANAM's fleet). In the last reporting period, NOVANAM has cooperated with the NGO *Albatross Task Force of the Namibian Nature Foundation* to work on the placement of tory lines to improve their efficiency in reducing incidents with seabirds. According to *Albatross Task Force* in Namibia, seabird's mortality has dropped by 80% via de use of *tori lines*.
- Project for mangle (*Rhizophora mangle*) reforestation in CAMANICA and PROMARISCO (with a total of 13,500 propagules planted in areas close to the farms), associated benefits being the creation of habitats and hatchery areas, reduction of environment pollution and control of soil erosion.

- Project of a nursery garden: in CAMANICA with the production of 30,300 native plants of up to 30 species for subsequent planting through an alliance with National Forestry Institute (INAFOR) whose aim is to reforest the surroundings of the farms and thus help combat soil erosion. Since this project began, back in 2015, a total of 168,300 plants have been cultivated for subsequent forestation
- Project of a teak forest: CAMANICA undertakes the maintenance of a teak forest occupying an area of 1,242.8 ha, contributing to the sequestering of CO₂.
- In CAMANICA, in partnership with the NGO Quetzalli, the impacts that aquaculture may have on migratory birds are analysed and good practices are implemented to ensure the welfare of these birds.

3.2.6. Social Platforms - OHS AND WELLBEING



In the OHS Platform, we have included all the projects and actions which, transversally to our activities, contribute to the prevention of occupational hazards and improve the health of our employees.

In this Platform, in the A2022-M2023 reporting period, we have undertaken, in 11 countries and their workplaces, actions related to OHS as well as actions aimed at improving employee's health and wellbeing. These programs apply to 100% of the headcount in the 13 companies within the scope of this report.

a. Occupational Health and Safety

The corporate programme for Occupational Health and Safety is implemented in 100% of the companies and their respective work centres, and thus, it applies to 100% of the workforce.

- KPIs measurement. Through the defined KPIs, the OHS program measures its effectiveness in all the Group's workplaces to establish the appropriate improvements to reach the zero accidents target (Table II).
- Quantifying accident rates allows to establish improvement actions. Thus, in this reporting period it is worth mentioning the purchase of trolleys and forklifts to avoid lifting weights in EIRANOVA; use of forklifts in the I.C. Lüderitz (NOVANAM) to reduce the weight of moving products; the monitoring of working hours on board the NOVANAM vessels to ensure that the crew has the necessary breaks; improvements in equipment to prevent ergonomic risks, as well as the realization of prevention exercises in PROMARISCO work centres. In PESCAMAR, we renewed 4 winches for anchors as an indispensable safety measure on board in case of bad weather or breakdowns: the replacement of watertight doors on the Antares IV and the improvement of the level of comfort in the bridge and in cabins and the installation of non-slip floor in the heads (bathrooms). In the I.C. Arteixo of PESCANOVA ESPAÑA the line for placing absorbents has been improved with the aim of eliminating repetitive movements and their consequent ergonomic problems; installation of stairs to climb the perimeter pipe in the I.C. Xove of INSUÍÑA; in the I.C. Mougás of INSUÍÑA we highlight the placement of an elevated platform to improve the loading of feed silos, the thermal insulation in the fish grading area to avoid high temperature in Summer, the installation of fall protection ladders for access to decks; and in PESCANOVA BIOMARINE CENTER bars were installed on the work desks to increase the existing level of lighting in the laboratory once the lighting was measured and the results indicated that it was lower than the recommended levels, safety signage was reinforced at several points and stairs were changed in the pump house, among other improvements

- OHS training was undertaken in 100% of the companies within the scope of this report.

Table II. Number of accidents and rates, in the A2022-M2023 reporting period, in the Nueva Pescanova Group. Worked hours are the theoretical hours in the collective bargaining agreements. Incidence rate: Number of accidents per 1,000 workers (amount of accidents/number of workers x 1,000); Frequency rate: number of accidents per 1,000,000 hours worked (number of accidents/ hours worked x 1,000,000); Severity rate: Days lost per 1,000 hours worked (Days lost/ hours worked x 1,000).

	Female	Male	Total
Number of accidents	71	221	292
Incidence rate	13.00	29.21	22.41
Frequency rate	6.05	13.63	10.45
Severity rate	0.11	0.30	0.22

b. Health and Wellbeing Program

In this platform we include the health and wellbeing programs carried out by Group companies:

- On-boarding and annual medical check-up. We work on the prevention and early detection of potential diseases by carrying out an on-boarding as well as annual medical check-ups of the Group's employees (periodic monitoring of the workers' health status). This medical check-up, in addition to measuring the usual parameters, is adapted to the job carried out by each worker with special emphasis on the hazards inherent to the worker's duties. In PROMARISCO, medical check-ups evaluate the nutritional health of the employees, and they are advised on healthy habits and referred to the Ecuadorian Institute of Social Security.
- Vaccination programs: infectious diseases that are common, and even endemic in some countries, and cause high health costs and sometimes very serious complications for the people who suffer from them. Vaccination has proved to be the most effective and safest measure for the prevention of these diseases and that is the reason why we have set up a series of vaccination programs in cooperation with the relevant health authorities:
 - Vaccination against influenza. In cooperation with the relevant health authorities, the vaccination against influenza campaign was carried out in the five industrial centers of PESCANOVA ESPAÑA (I.C. Arteixo, I.C. Catarroja, I.C. Chapela, I.C. Paterna and I.C. Porriño); in I.C. Xove and I.C. Mougás of INSUÍÑA, in PESCANOVA BIOMARINE CENTER, as well as in all work centers of CAMANICA, NOVAGUATEMALA, PROMARISCO and NOVANAM.
 - Vaccination against COVID-19: it is worth mentioning the campaign for vaccination against COVID-19 undertaken in INSUÍÑA (I.C. Mougás), NOVAGUATEMALA, CAMANICA and PROMARISCO.
 - Other vaccination campaigns: Apart from the abovementioned campaigns we undertake other campaigns for the vaccination against pneumococcus in NOVAGUATEMALA.
- There are also worth mentioning other health related programs undertaken by the Group:
 - Early identification campaign of chronic obstructive pulmonary disease (COPD) in the Chapela I.C. in collaboration with the Álvaro Cunqueiro Hospital in Vigo.

- NOVAPERÚ has carried out a nutrition program led by a nutritionist whose objective is the treatment and prevention of obesity through weight assessments programs adapted to each person and periodic monitoring.
- In P. LOBITO workers are supported with aid packages in case of medical need.
- NOVAGUATEMALA has implemented, in collaboration with the Ministry of Public Health, the realization of IVAA (Visual Inspection with Acetic Acid) as a preventive action in the development of uterine cancer.
- In NOVANAM (I.C. Lüderitz) we have a health centre that permanently attended by two nurses who attend to the health needs of our employees and that from time to time organizes preventive talks on health.
- PROMARISCO has several programs aimed at the prevention and treatment of diseases, such as:
 - Hypertension. Program that includes blood pressure monitoring, treatment and follow-up. The treatment includes the low-sodium diet that is sent to the canteen to be applied to each specific worker.
 - Diabetes: a program that consists of taking height, weight, abdominal circumference measurement and clinical laboratory tests to rule out diabetes or prediabetes and perform inter-consultation to the specialty of endocrinology and determine the treatment.
 - Vitamin B complex health program that is prescribed to cold-storage and shrimp farm workers as a preventive action against neuropathic diseases.
 - Campaign for the prevention of alcohol, tobacco, and other drugs abuse in collaboration with the Ministry of Public Health.
 - Treatment program against parasites to those employees who need it.

3.2.7. Social platforms - LABOUR RELATIONS



In the Nueva Pescanova Group, we undertake to establish responsible and transparent labour relations through the drawing up and implementation of responsible action policies and/or the required procedures to ensure the application of our principles, code of ethics and regulatory compliance.

In the Labour Relations Platform, we have grouped all the projects and actions which, transversally to our activities, contribute to responsible and transparent labour relations.

In this platform, in the reporting period A2022-M2023, we have performed in 11 countries and 13 companies within the scope of this report, a total of 241 actions, some of which are detailed below:

a. Compliance with labour laws

The Nueva Pescanova Group complies with the general rules on employment, committing itself to the use of the various types of hiring, in accordance with the purpose of each of the contracts.

100% of the Group's employees are hired pursuant to contracts in accordance with the country's current legislation, in addition to decent and safe working conditions and fair remuneration.

b. Ensuring freedom of association

The Nueva Pescanova Group shows its firm commitment to and respect for the rights of its professionals recognized in the applicable labour regulations, including the rights of association, union, and strike.

The Group does not unduly impede or limit the exercise of freedom of association, the right to strike and collective bargaining in its workplaces, as reflected in national and international standards.

c. Maternity

The Nueva Pescanova Group shows its support for motherhood through various actions among which we highlight the following:

- Availability of properly equipped lactation rooms where breastfeeding worker can pump breast milk and store it in the appropriate conditions for later use in PROMARISCO for administrative, processing plant and farms staff, in NOVAGUATEMALA for administrative and processing plant staff and in NOVAPERÚ.
- Availability of flexible working hours as a work-life balance measure in EIRANOVA, INSUÍÑA and NUEVA PESCANOVA, NUEVA PESCANOVA FRANCE, NOVAGUATEMALA, NOVANAM, NOVAPERU, PESCANOVA ESPAÑA and P. LOBITO.
- Granting of paid maternity leave longer than those required by law in PESCANOVA SPAIN (one week more than the official leave established in the Equality Plan), P.LOBITO grants paid maternity leave in a country where the public system is not sufficiently developed for these situations, PROMARISCO grants maternity leave of 91 days, the official leave being of 84 days, and it applies to all its workplaces; in CAMANICA there is a "Maternity Protection Policy for Working Women" which apart from the relevant maternity leave of to 84 days, 14 more days are guaranteed and the recognition of 40% of their salary, this applies to 100% of its employees in all its workplaces.
- Granting breastfeeding permits longer than the mandatory ones in PESCANOVA SPAIN extending the breastfeeding period from 9 to 12 months, in P. LOBITO and PROMARISCO.
- Conducting awareness campaigns on breastfeeding in NOVAPERU, PROMARISCO, NOVAGUATEMALA, CAMANICA, NOVANAM, as well as PESCANOVA ESPAÑA and NUEVA PESCANOVA.

d. Food at the workplace

The Nueva Pescanova Group facilitates the intake of food in the different workplaces through, among other, the following actions:

- Provision of work canteen in ARGENOVA, in Puerto Deseado the company provides a canteen where employees with a full-time contract can eat; CAMANICA and PROMARISCO have canteens for all employees of the different work centres, NOVANAM, NOVAPERU, PESCANOVA ESPAÑA in the I.C. Chapela and all employees on board of vessels (ARGENOVA, P. LOBITO, PESCAMAR and NOVANAM) have food provided.
- The canteens of the companies mentioned in the previous paragraph have healthy menu options.
- Meals is fully subsidized in the fleets of ARGENOVA, NOVANAM P. LOBITO and PESCAMAR, as well as in the PESCAMAR shipyard when the work shifts are different from a regular day, in NOVAPERU, in ARGENOVA (Puerto Deseado) when the shifts are intensive, in CAMANICA, PROMARISCO and NOVANAM. This expense is partially subsidized by the company in PESCANOVA ESPAÑA (I.C. Chapela and I.C. Porriño), ARGENOVA (Buenos Aires) and in CAMANICA for administration staff.
- The 13 companies within the scope of this report have enabled fully equipped areas to eat and that the company makes available to all its employees.

- In the vending machines installed in PESCANOVA ESPAÑA (I.C. Porriño and I.C. Catarroja), improvements have been made in the offer, replacing less healthy products with more healthy options.
- Provision of free access service for snacks such as coffee, milk, and other products in PESCAMAR, PESCANOVA BIOMARINE CENTER, EIRANOVA, NUEVA PESCANOVA FRANCE, P. LOBITO, ARGENOVA, NOVAGUATEMALA, CAMANICA, and PROMARISCO
- Provision of free drinking water fountains for 100% of the employees of the companies included in this report.
- The company provides advantageous conditions for food, medical and educational expenses through different programs in ARGENOVA, CAMANICA, INSUÍÑA, NUEVA PESCANOVA, NUEVA PESCANOVA FRANCE, NOVANAM, NOVAPERU, PESCANOVA ESPAÑA, P. LOBITO, PESCAMAR AND PROMARISCO.

3.2.8. Social Platforms – EQUALITY AND DIVERSITY



To promote equal opportunities and diversity within the Nueva Pescanova Group, we are committed to developing ways to assess, quantify and communicate our commitment to equal opportunities between genders, non-discrimination, and diversity in all its variables, in accordance with our Corporate Policy on Responsible Management of People, implementing the specific measures necessary to achieve it.

In the Equality and Diversity Platform we include all the projects and actions which, transversally to our activities, contribute to ensuring equal opportunities and diversity of the Group's employees.

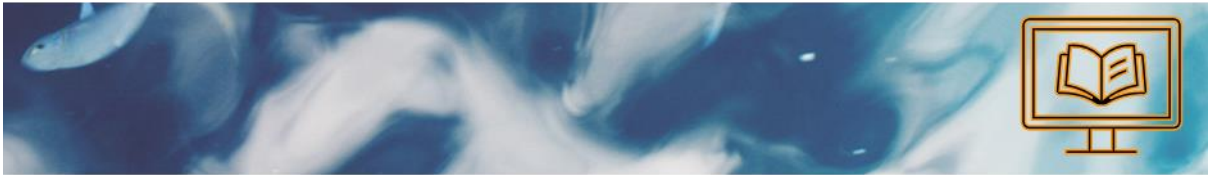
Below are some notable examples:

- Equality Plan. Approval and publication of the Equality Plan in June 2021, which applies to the 5 industrial centers integrated in PESCANOVA ESPAÑA (I.C. Arteixo, I.C. Catarroja, I.C. Chapela, I.C. Paterna, I.C. Porriño). I.C. Mougás of INSUÍÑA has set up an equality commission. In NUEVA PESCANOVA FRANCE there is an equality policy that applies to all workplaces. NOVANAM submits annual equality plans, which apply to all its workplaces, to the Employment Equity Commissioner. Since January 2019 NOVAPERU has enforced a Policy Against Harassment and in Favour of Equality. PROMARISCO performs a competency training plan aimed at women.
- Among some measures for gender equality, it should be noted that PESCAMAR promotes the presence of women both in offices and in the shipyard; in the industrial centres of PESCANOVA ESPAÑA the hiring of women is encouraged; in NUEVA PESCANOVA FRANCE a salary increase is on returning to the workplace after a maternity leave; in NOVANAM the recruitment policy always takes into account gender equality; in CAMANICA the "Policy of Good Labour and Social Practices" was implemented through which gender equality is promoted in all human resources processes, such as hiring, training, performance evaluations, internal promotions, etc.; and in PROMARISCO a female workers who occupy leadership positions in any of its workplaces attended, from September 15 to September 23, 2022, a management skills training program.
- In terms of measures implemented in respect of diversity, we highlight that in I.C. Arteixo of PESCANOVA ESPAÑA, in collaboration with the Friends of Galicia Foundation, we provided a week training for a group at risk of social exclusion (especially migrants) with the possibility of later being hired for the processing plant. In I.C. Chapela of PESCANOVA ESPAÑA, two people from Down Vigo

have been hired. EIRANOVA has an "*Employee Handbook*" where the different measures to promote diversity are indicated. NOVAPERÚ has made statements to sensitize employees in the non-discrimination of any group and in favour of diversity. In NOVAGUATEMALA employees receive training in sign language to favour the integration of hearing-impaired people and has also favoured the hiring of people from the community "el Triunfo" through of a bus service that favours their access to work. CAMANICA, in agreement with the Ministry of Public Health, people with diseases such as hypertension, diabetes, renal failure, etc., who in other circumstances would have difficulty accessing a job, were hired. PROMARISCO has held, in collaboration with the Ministry of Labour, talks on equity and inclusion at work, sign language training is also provided to social workers in the of social welfare and HR department in the selection area with the aim of achieving better communication with staff hearing-impaired people and facilitating their inclusion in the workplace.

- WIP (Women in Pescanova). Network of women of the Nueva Pescanova Group whose objectives are focused on giving greater visibility to the female professionals who are part of the organization, as well as on promoting gender diversity and obtaining a more balanced presence of women in the positions of responsibility of the company. Among the activities organized there were 5 and advocacy groups meetings, debates, and other events with relevant guests, such as the event organized on March 16, 2023, on the 5th anniversary of the constitution of the WIP Group during which awards were presented in two categories: the most influential and the best trajectory.
- The Protocol of Action on Harassment, which applies to 100% of the five industrial centres of PESCANOVA ESPAÑA and which, signed within the Equality Commission of Pescanova España, aims to prevent situations of Harassment (in any of its manners) in the workplace and, if it occurs, ensure that adequate procedures are in place to deal with the problem and prevent its recurrence. With the approval of this Protocol of Action, the Harassment Commission of PESCANOVA ESPAÑA is created, whose main task is to receive, investigate and resolve Harassment Complaints that may occur within the Company, in accordance with the rules of procedure contained therein. EIRANOVA's "*Employee Handbook*" includes a protocol for the prevention of harassment in the workplace. NOVAPERU has a Harassment and Equality Policy for the prevention of any form of harassment in the company. NOVANAM has a complaint procedure in the workplace and its use by employees is encouraged when the situation so requires. PESCAMAR has an internal procedure, through the complaints and denunciations mailbox, which ensures confidentiality in the resolution of this type of situations. In NOVAGUATEMALA there is a procedure to follow in case of harassment. CAMANICA has its own policy of good social practices that includes the prevention of workplace harassment and how to act in those cases. A "Zero Harassment Policy" has been implemented and was e-mailed to all employees and placed on murals to ensure awareness by all employees. PROMARISCO implemented since November 2020 the internal procedure for "Identification and Attention to Cases of Discrimination, Workplace Harassment and all Forms of Violence against Women in the Workplace" to enable a communication channel and channels of Internal action between the company and employees to establish prevention measures and ensure timely attention to any possible case of infringement and is applicable to 100% of its workplaces.
- 100% of the companies within the scope of this report have reporting channels in cases of harassment in the workplace that ensure confidentiality in the treatment and resolution of cases that may arise.

3.2.9. Social platforms - TRAINING AND TALENT



In the Training and Talent Platform, we have grouped all the projects and actions, which, transversally to our activities, contribute to training our employees as well as to recruitment and talent management.

In the A2021-M2022 reporting period, regarding this platform we have undertaken, in 11 countries and 13 workplaces, within the scope of this report, a total of 123 actions, the most remarkable a shown below:

a. Employee's training

Training employees in different capabilities and skills: with 9,474 impacts, measured as number of people involved, with the following projects:

- Annual training plan involving 8,158 people with 52,462 training hours. This training has been face-to-face and online, having increased the online training due to the Covid-19 pandemic.
- *e-learning* Platform: with 1,316 users in the different Group companies: ARGENOVA (86); PROMARISCO (349); PESCANOVA ESPAÑA (317) [I.C. Arteixo (53), I.C. Catarroja (26), I.C. Chapela (119), I.C. Paterna (20), I.C. Porriño (99)]; NOVAGUATEMALA (54); NOVANAM (66); NOVAPERÚ (28); INSUIÑA (59); CAMANICA (224); EIRANOVA (8); PESCAMAR (20); NUEVA PESCANOVA FRANCE (105); having reached 3,130 training hours.

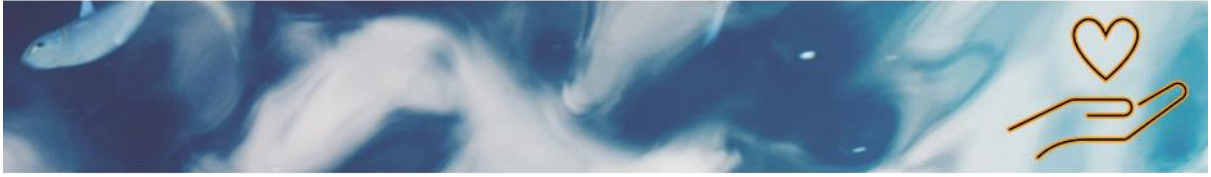
b. Talent Management

Talent management and development has had, at least, 1,856 impacts, measured as number of people involved through the following projects and 88 actions:

- The ABACO program for talent recruitment and development, at March 31, 2023, had 1,220 people registered, allocated as follows: ARGENOVA (84); CAMANICA (210); EIRANOVA (8); INSUIÑA (30); PESCANOVA BIOMARINE CENTER (9); NUEVA PESCANOVA FRANCE (136); NOVAGUATEMALA (35); NOVANAM (53), NOVAPERÚ (19); PESCANOVA ESPAÑA (261) [I.C. Arteixo (31), I.C. Chapela (103), I.C. Paterna (21), I.C. Catarroja (22), I.C. Porriño (84)]; P. LOBITO (1); PESCAMAR (13); and PROMARISCO (345).
- The FARO program for talent recruitment and development, at March 31, 2023, had 440 people registered, allocated as follows: ARGENOVA (1); CAMANICA (12); EIRANOVA (1); INSUIÑA (26); PESCANOVA BIOMARINE CENTER (1); NUEVA PESCANOVA FRANCE (30) [Corporate Office (17), I.C. Boulogne (5); I.C. Lorient (8)]; NOVAGUATEMALA (70); NOVANAM (1), NOVAPERÚ (19); PESCANOVA ESPAÑA (77) [I.C. Catarroja (13), I.C. Chapela (11), I.C. Porriño (24), I.C. Arteixo (16), I.C. Paterna (13)]; P. LOBITO (1); PESCAMAR (1); and PROMARISCO (200).
- Mentoring Program. 53 people participated in the IMPULSA Program, distributed as follows: PESCANOVA ESPAÑA (25) [I.C. Arteixo (6), I.C. Chapela (11), I.C. Catarroja (3), I.C. Porriño (12), I.C. Paterna (3)]; EIRANOVA (3); INSUIÑA (9); PESCANOVA BIOMARINE CENTER (3); P. LOBITO (1); and NOVANAM (2).
- Other actions such as:
 - ARGENOVA: Agreement with the school "17 de Agosto" and the Industrial College "Óscar Smith", both in Puerto Deseado with the incorporation of 6 people.

- ARGENOVA: Agreement with the University of Palermo s with the incorporation of 6 people.
- CAMANICA: Agreement with the Faculty of Agricultural and Veterinary Sciences of the National Autonomous University of Nicaragua (UNAN-León) to attract young talent recently graduated from "Aquaculture Engineering" and give them the opportunity to develop by including them in the Trainee Program for our farms. During the reporting period, 2 people were joined this program.
- INSUÍÑA: A 4-year agreement entered on 23-12-2021, with the University of Lugo for the incorporation of interns.
- INSUÍÑA: Agreement for the incorporation of students with the Aquaculture Training Cycle (IGAFA).
- PESCANOVA BIOMARINE CENTER: Internships for students of advanced vocational education.
- NOVAGUATEMALA: The students of Food Industry Studies of the CEPAC school, undertake internships in the company and 5 of them were hired.
- NOVAGUATEMALA: Internships are promoted with the University of Mariano Gálvez in food engineering. In the reporting period up to 3 fellows completed 200 h of supervised internships.
- NOVANAM: Cooperation with the "Office of the First Lady of Namibia" in Lüderitz in the "ONE Economy Foundation's Talent Individual Programme" (TIP), sponsoring 2 people.
- NOVANAM: The company cooperated with the officer training program offering internships on board.
- PESCANOVA ESPAÑA: Participation of the I.C. Porriño and C.I Chapela in the Dual Vocational Training on Food and incorporation of scholarship holders in the I.C. Arteixo in alliance with the Salcines Foundation.
- P. LOBITO: Benguela Nautical Middle School Internship for Bridge Officers.
- PESCAMAR: Internships on board for students from the Escola de Pesca de Matola. During the reporting period, a total of 13 students were able to complete these internships.
- PROMARISCO: Participation in the IV Aquaculture Trainees Program of 9 young professionals who were training for a period of six months in the farming division.
- PROMARISCO: Participation in 5 job fairs promoted by the Ministry of Labour, promoting job opportunities and a space for professional guidance to students and graduates of the main middle or higher education studies in the country.
- Participation in programs for the collection of improvement ideas (IDM in Spanish) implemented by the continuous improvement division of I.C. Chapela, I.C. Paterna, I.C. Catarroja and I.C. Porriño of PESCANOVA ESPAÑA, INSUÍÑA (I.C. Xove), PROMARISCO, NOVAGUATEMALA, CAMANICA, ARGENOVA, NOVANAM and NUEVA PESCANOVA FRANCE.

3.2.10. Social Platforms –SOCIAL ACTION AND HUMANITARIAN AID



In the Social Action and Humanitarian Aid Platform, we have grouped all the projects and actions, which, transversally to our activities, contribute to improve the living standards in the Communities in which we are present. Responsible actions are grouped under two transversal initiatives, i.e., Humanitarian Aid and Social Action. The latter focusing on the responsible actions in the field of Employment (favoring quality employment and local entrepreneurship, paying special attention to the most vulnerable groups), Education (promoting quality education to offer better living opportunities), Environment (raising awareness about the importance of taking care of the environment and encouraging biodiversity).

In the A2022-M2023 reporting period, in this platform we have undertaken, in 11 countries and 13 companies, a total of 74 actions.

a. Social Action

- The Nueva Pescanova Group encourages and creates, locally, quality, and stable jobs (legal, safe, and fair) with employment rates which in some cases are significant, as in Lüderitz (Namibia) where the employment rate reached 46%, via de subsidiary company NOVANAM (Table III).
- The Nueva Pescanova Group recruits and transfers know-how to local communities. We highlight the following:
 - Escola de Pesca de Matola. We continue with the program for the strengthening of the professional skills of the maritime-fishing sector of Mozambique, because of the implementation of a Public-Private Alliance for Development (APPD in Spanish) for the development of maritime-fisheries training in Mozambique through the Escola de Pesca de Matola in collaboration with AECID (Spanish Agency for International Development Cooperation). IPMPA (Instituto Politécnico Marítimo-Pesquero Atlántico) (Xunta de Galicia), PESCAMAR and NUEVA PESCANOVA. Through this program, the employability of young people in the country has improved, adapting their training to the needs of the fishing industry. In the last reporting period, 13 students have joined the Group's fishing fleet, with a total of 62 students since its inception in 2018.
 - Kindergarten. In Lüderitz (Namibia) our subsidiary NOVANAM puts at the disposal of its employees a kindergarten which in the last reporting period had 89 boys and girls. The number of kids attending since the beginning of the program, back in 2010, reaches 1,289.
 - Adults school. PROMARISCO in cooperation with the Ministry of Education, has a school for its employees structured in two levels (literacy and basic education) that allows access to a subsequent exam that formalizes the educational level achieved at school. After the previous edition, the school currently has 34 students enrolled.
 - Program of visits to the Group's facilities organized by ARGENOVA where 34 students from the "Oscar Smith" Industrial School of Puerto Deseado visited the processing plant with the aim of deepening their learning in production processes, INSUÍÑA with visits from the IES Monte Castelo in Burela to I.C. Xove and visit of the students of the IES Valadares in Vigo to I.C. Mougás, and PESCANOVA ESPAÑA with visits from several schools in the area of I.C. Porriño, from IES Fernando Blanco to I.C. Arteixo and also students from the University of Vigo from Food Technology Studies visited I.C. Chapela.

- NOVAGUATEMALA also implements training programs for the community through the CEPAC school. For this year, a total of 752 students have enrolled at the Pre-primary, Primary, Basic, and Diversified educational levels.
- NUEVA PESCANOVA, through the museum installed in the PESCANOVA BIOMARINE CENTER, contributes to the dissemination and awareness of marine ecosystems and their importance for life on earth, the problems of the seas and oceans and the future challenges to take care of them together.
- The Nueva Pescanova Group is committed to the care of the natural environment where it is present, participating in several projects to improve the local environment
 - Awareness campaigns. In PROMARISCO we organized talks on the importance of the mangrove ecosystem aimed at schools in the area, for both teachers and students. There were also talks on correct management of crocodiles. The results of the study on environmental impact of shrimp farms on biodiversity were released.
 - NOVANAM: 4 members of our fleet attended the workshops provided by *Albatross Task Force*.
 - Cleaning days. Carried out in NUEVA PESCANOVA (PBC), NOVAGUATEMALA, NOVANAM, P. LOBITO, PESCAMAR and PROMARISCO, collecting at least 2.1 t of litter.

Table III. Employment rate generated by the Group's workplaces. (*) Source: World Bank database; (**) Sources: INDEC (Argentina) INE (Spain), INE (Mozambique), INE (Guatemala), INEC (Ecuador), INEI (Peru), INSEE (France), CSO (Ireland) and NSA (Namibia); Estimation taking as a basis the percentage of the country's workforce.

ACTIVIDAD	EMPRESA	Nº EMPLEADOS	PAÍS	POBLACIÓN(*)	MUNICIPIO	POBLACIÓN(**)	POBLACIÓN ACTIVA	%EMPLEO GENERADO
P E S C A N O V A	ARGENOVA	702	ARGENTINA	45,376,763	PUERTO DESEADO	14,183	6,004	11.7%
	NOVANAM	2,141	NAMIBIA	2,540,916	LÜDERITZ	12,537	4,592	46.6%
		389			WALVIS BAY	62,096	22,745	1.7%
	PESCAMAR	464	MOZAMBIQUE	31,255,435	BEIRA	592,090	258,799	<1%
	MARNOVA	73	ANGOLA	32,866,268	LOBITO	324,050	132,272	<1%
A C T I V I D A D E S C U L T U R A	PROMARISCO	1,687	ECUADOR	17,643,060	DURÁN	243,235	106,124	1.6%
	NUEVAGUATEMALA	1,400	GUATEMALA	16,858,333	CHAMPERICO	32,815	12,433	11.3%
	CAMANICA	1,271	NICARAGUA	6,624,554	PUERTO MORAZÁN	13,328	5,932	21.4%
		1,296			CHINANDEGA	121,793	54,206	2.4%
	INSUIÑA	41	ESPAÑA	47,351,567	OIA	3,049	1,480	2.8%
		123			XOVE	3,277	1,591	7.7%
	BIOMARINE	19			O GROVE	10,518	5,106	<1%
T R A N S F O R M A C I Ó N	NOVAPERÚ	112	PERÚ	32,971,846	SAN JUAN DE MIRAFLORES	355,219	174,549	<1%
	PESCANOVA ESPAÑA	124	ESPAÑA	47,351,567	ARTEIXO	32,738	15,892	<1%
		557			REDONDELA	29,241	14,195	3.9%
		176			PORRIÑO	20,100	9,757	1.8%
		67			CATARROJA	28,608	13,887	<1%
		70			PATERNA	71,035	34,483	<1%
	EIRANOVA	28	IRLANDA	4,994,724	CASTLETOWNBERE	860	416	6.7%
	NUEVA PESCANOVA FRANCE	66	FRANCIA	67,391,582	BOULOGNE SUR MER	40,664	18,260	<1%
		76	FRANCIA		LORIENT	57,084	25,633	<1%

b. Humanitarian Aid

The Nueva Pescanova Group has implemented a donation program aimed at improving the live, health and wellbeing of the most vulnerable groups, especially those who are victims of catastrophes caused by natural or other disasters.

In the last reporting period, donations made by the companies within the scope of this report reached €526,052. Up to €334,681 (64% of donations) correspond to the donation of 96,653 kg of food. Cash donations reached €135,978, the most significant was the donation of NOVAGUATEMALA for €44,477 for the CEPAC School. Other donations for a total value of €55,393, of which the most significant is the donation of fishing and maritime material, for €25,000 for the Escola de Pesca de Matola in Mozambique, to provide practical training to the students (Table IV).

Table IV. Donations reported for the companies of the Nueva Pescanova Group in the reporting period.

COMPANY	Kg Food	Value (€)
ARGENOVA	2,123	19,059
CAMANICA	27	10,313
EIRANOVA		550
NOVAGUATEMALA		44,477
NOVANAM	17,152	101,572
NOVAPERU		932
NUEVA PESCANOVA		32,946
PESCAMAR	1,750	28,357
PROMARISCO		10,736
PVA ESPAÑA	75,092	276,306
LOBITO	510	804
TOTAL	96,653	526,053

3.2.11. Product Platform – FOOD QUALITY AND SAFETY (QUALITY EXCELLENCE)



In the Food Quality and Safety Platform, we have grouped all the projects and actions, which, transversally to our activities, contribute to ensure the quality and safety of our products, by certifying all the facilities and procedures for processing as compliant with the relevant standards, and clearly and transparently showing these certifications on our products.

- Training in Food Safety. Within the plan for food safety assurance, we have intensified the knowledge of our employees on this subject

- Reduction of the complaints rate by installation or renewal of the following equipment and processes:
 - In I.C. Porriño of PESCANOVA ESPAÑA, complaints for the presence of foreign matter have been reduced after specific training of workers in the detection of foreign matter in the processing lines.
 - In I.C. Chapela of PESCANOVA ESPAÑA, we have installed a gauge in the line of *anguriñas* and *chanquitos*, a perforator to avoid inflated packs, two new metal detectors, as well as the installation of artificial vision systems to guarantee the coding of the products, reinforcement at the exit of tunnel 3 to avoid broken packs and reinforcement at the head of the line for chilled surimi sticks (*palitos*) to reduce the presence of foreign matter.
 - In I.C. Paterna of PESCANOVA ESPAÑA, the desalting process has been improved to ensure its homogeneity, the visual control of the presence of anisakis has been increased and the control of raw materials has been reinforced.
 - The change of manufacturing process from vacuum to skin-pack, has reduced claims for vacuum losses in shrimp tails in the I.C. Arteixo of PESCANOVA ESPAÑA.
 - NUEVA PESCANOVA FRANCE has invested in new laboratory equipment.
 - EIRANOVA has designed a in electronic methodology for monitoring parasites in cold-water shrimp.
 - In NOVAPERÚ, the control of finished products has been reinforced by incorporating a team that is responsible for controlling and monitoring the product for shipments.
 - In NOVANAM fleet, we increased the number of quality controllers for landed fish.
 - In CAMANICA, the control of the presence of non-compliant heads in vannamei shrimps has been reinforced.
 - Changes in the process of thawing and grading shrimp have made it possible to eliminate sources of foreign material at the NOVAGUATEMALA processing plant.
 - An artificial vision equipment installed in PROMARISCO processing plant has decreased the presence of foreign matter.

Committed to the goal that 100% of new products must be nutritious and healthy, we continue to progressively implement the following projects:

- Clean label: Focused on continuous improvement of the nutritional composition through the formulations of products, through reducing the content of specific nutrients such as salt and total fats and, at the same time, increasing the content of specific nutrients with beneficial effects such as proteins of high biological value, healthy fatty acids, fibre, and vitamins and minerals.
- Healthy preparations: focused on offering consumers healthier preparation options and therefore we are committed to making all our battered products available for being backed in the oven and in air fryer.
- Communication to the consumer: offering in a clear and transparent way in the packaging of the product all the relevant information for consumers such as the incorporation of the nutritional information of the product in all the indicated preparations, as well as the progressive incorporation of the NutriScore system.

4. Contribution to Sustainable Development.

As mentioned in section 3.2.1 above, through the RAP we have identified a total of 1,259 responsible actions which we have associated to the relevant targets of the 17 UN's SDGs, so there is a link between the responsible action and its contribution to sustainable development (Figure 6).



Figure 6. Number of actions and their contribution to each of the SDGs.

From the analysis of the chart above, it can be concluded that:

- The Nueva Pescanova Group contributes to 16 SDG, through 1,259 actions.
- The Group, though its actions with measured impact, contribute with a greater number of actions to the SDGs mentioned below:
- The Group, though its responsible actions, contributes with a greater number of actions to the SDGs mentioned below:
 - SDG 8 DECENT WORK AND ECONOMIC GROWTH, with 427 actions, with the aim of promoting inclusive and sustainable economic growth, employment and decent work for all.
 - SDG 12 RESPONSIBLE CONSUMPTION AND PRODUCTION, with 410 actions, with the aim of ensuring sustainable consumption and production patterns.
- To a lower extent, the Group also contributes to the following SDGs:
 - SDG 5 GENDER EQUALITY, with 223 actions, with the goal of achieving gender equality and empowering all women and girls.
 - SDG 10 REDUCED INEQUALITIES, with 169 actions, with the aim of reducing inequality within and between countries.

- SDG 4 QUALITY EDUCATION, with 164 actions, with the aim of ensuring inclusive, equitable and quality education and promoting lifelong learning opportunities for all.

The measurement of this contribution to sustainable development is assessed to later define the specific measures of alignment of our practices with the specific SDGs, pursuing the continuous improvement of our performance.

5. Communicating the Report on Responsible Action.

Transparency with our stakeholders, represented by public administrations, academia, suppliers, customers, consumers, civil society organizations and workers who belong to the company, is key to the development of the CSR Master Plan of the Nueva Pescanova Group and its Sustainability strategy.

The communication on the Responsible Action of the Group is part of the permanent and two-way dialogue that we maintain with stakeholders.

In the Nueva Pescanova Group, we are committed to preparing and communicating, on an annual basis, a report on the progress made regarding responsible action.

This fifth Responsible Action report is public and accessible on our website and reinforces the commitment to transparency in responsible action throughout the value chain and to know the impacts of our activities on social, economic, and environmental aspects.