



KPMG Auditores, S.L.
P.º de la Castellana, 259 C
28046 Madrid

Independent Assurance Report on the Non-Financial Statement of Nueva Pescanova, S.L., and its group companies, for the year ended 31 March 2024

(Translation from the original in Spanish. In case of discrepancy, the Spanish language version prevails.)

To the Shareholders of Nueva Pescanova, S.L.:

Pursuant to article 49 of the Spanish Code of Commerce, we have performed a limited assurance review of the accompanying Non-Financial Statement (hereinafter NFS) of Nueva Pescanova, S.L., (hereinafter the Parent) and its group companies (hereinafter the Group) for the year ended 31 March 2024, which forms part of the consolidated Directors' Report of the Group for the year ended 31 March 2024.

The NFS includes additional information to that required by prevailing mercantile legislation concerning non-financial information, which has not been the subject of our assurance work. In this respect, our work was limited exclusively to providing assurance on the information contained in the "Index of contents required by Lay 11/2018, of 28 December" table of the accompanying NFS.

Directors' Responsibility

The Directors of the Parent are responsible for the content and authorisation for issue of the NFS included in the Group's consolidated Directors' Report. The NFS has been prepared in accordance with prevailing mercantile legislation and selected Sustainability Reporting Standards of the Global Reporting Initiative (GRI Standards) based on each subject area in the "Index of contents required by Lay 11/2018, of 28 December" table of the aforementioned NFS.

This responsibility also encompasses the design, implementation and maintenance of internal control deemed necessary to ensure that the NFS is free from material misstatement, whether due to fraud or error.

The Directors of the Parent are also responsible for defining, implementing, adapting and maintaining the management systems from which the information required to prepare the NFS was obtained.

Our Independence and Quality Control

We have complied with the independence and other ethical requirements of the International Code of Ethics for Professional Accountants (including international independence standards) issued by the International Ethics Standards Board for Accountants (IESBA), which is founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality and professional behaviour.



(Translation from the original in Spanish. In case of discrepancy, the Spanish language version prevails.)

Our firm applies International Standard on Quality Management 1 (ISQM1), which requires us to design, implement and maintain a system of quality management, including policies and procedures regarding compliance with ethical requirements, professional standards and applicable legal and regulatory requirements.

The engagement team was comprised of professionals specialised in reviews of non-financial information and, specifically, in information on economic, social and environmental performance.

Our Responsibility

Our responsibility is to express our conclusions in an independent limited assurance report based on the work performed.

We conducted our review engagement in accordance with the requirements of the Revised International Standard on Assurance Engagements 3000, "Assurance Engagements other than Audits or Reviews of Historical Financial Information" (ISAE 3000 Revised), issued by the International Auditing and Assurance Standards Board (IAASB) of the International Federation of Accountants (IFAC), and with the guidelines for assurance engagements on the Non-Financial Information Statement issued by the Spanish Institute of Registered Auditors (ICJCE).

The procedures performed in a limited assurance engagement vary in nature and timing from, and are less in extent than for, a reasonable assurance engagement, and consequently, the level of assurance provided is also lower.

Our work consisted of making inquiries of management, as well as of the different units and areas of the Parent that participated in the preparation of the NFS, reviewing the processes for compiling and validating the information presented in the NFS and applying certain analytical procedures and sample review tests, which are described below:

- Meetings with the Parent's personnel to gain an understanding of the business model, policies and management approaches applied, the principal risks related to these matters and to obtain the information necessary for the external review.
- Analysis of the scope, relevance and completeness of the content of the NFS for the year ended 31 March 2024 based on the materiality analysis performed by the Parent and described in the "Materiality" section, considering the content required by prevailing mercantile legislation.
- Analysis of the processes for compiling and validating the data presented in the NFS for the year ended 31 March 2024.
- Review of the information relative to the risks, policies and management approaches applied in relation to the material aspects presented in the NFS for the year ended 31 March 2024.
- Corroboration, through sample testing, of the information relative to the content of the NFS for the year ended 31 March 2024 and whether it has been adequately compiled based on data provided by the information sources.
- Procurement of a representation letter from the Directors and management.



(Translation from the original in Spanish. In case of discrepancy, the Spanish language version prevails.)

Conclusion

Based on the assurance procedures performed and the evidence obtained, nothing has come to our attention that causes us to believe that the NFS of Nueva Pescanova, S.L., and its group companies, for the year ended 31 March 2024 has not been prepared, in all material respects, in accordance with prevailing mercantile legislation and selected GRI Standards based on each subject area in the "Index of contents required by Lay 11/2018, of 28 December" table of the aforementioned NFS.

Use and Distribution

This report has been prepared in response to the requirement established in prevailing mercantile legislation in Spain, and thus may not be suitable for other purposes and jurisdictions.

KPMG Auditores, S.L.

(Signed on original in Spanish)

Silvana Alfaya Bas

14 June 2024



**REPORT ON THE NON-FINANCIAL
STATEMENT OF
NUEVA PESCANOVA, S.L.,
AND ITS GROUP COMPANIES,
FOR THE YEAR ENDED MARCH 31, 2024**

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

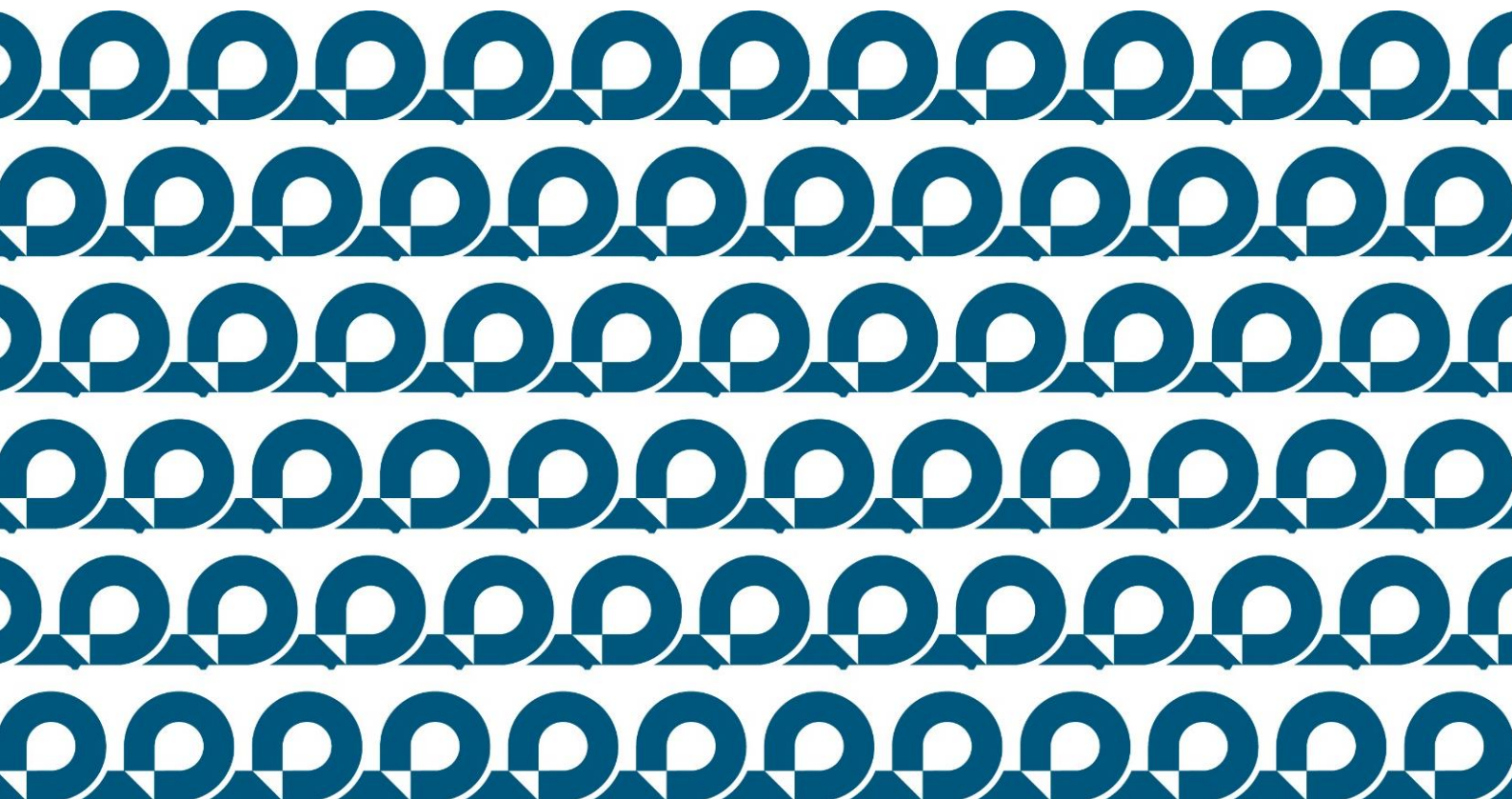


TABLE OF CONTENTS

I. INTRODUCTION.....	5
II. GENERAL ISSUES ON THIS NON-FINANCIAL STATEMENT FOR THE FINANCIAL YEAR ENDED MARCH 31, 2024	5
1. Business model.....	5
1.1 Overview and major markets.....	5
1.2 Business Environment, Competitive Framework, and Future Trends	8
1.3 Organization and Structure of the Nueva Pescanova Group	9
2. Corporate Social Responsibility (CSR)	9
2.1 Materiality	10
2.2 Commitments, Targets, and Sustainability Objectives	12
2.3 Programmes	12
2.4 Contribution to Sustainable Development	16
2.5 Recognitions	16
3. Certifications.....	17
3.1 Certifications for Aquaculture and Fisheries Sustainability.....	18
3.2 Environmental Management System Certifications.....	18
3.3 Certifications in Labour Practices	18
3.4 Food Safety and Quality Certifications.....	19
3.5 Other Certifications.....	19
4. Business Ethics, Institutional Integrity, and Regulatory Compliance	19
5. Risks Related to the Matters Included in Non-Financial Information	20
III. INFORMATION ON ENVIRONMENTAL ISSUES	21
1. General Issues.....	21
2. Sustainable Use of Resources.....	22
2.1 Rational Use of Water.....	22
2.2 Rational Use of Materials	24
2.3 Rational use of energy.....	24
3. Circular Economy and Waste Prevention and Management	26
3.1 Waste Generation at Nueva Pescanova Group	27
3.2 Waste Prevention, Recycling, and Reuse Measures	27
3.3 Other Forms of Waste Recovery and Disposal.....	27
3.4 Actions to Combat Food Waste	28
4. Climate Change	28
5. Biodiversity Protection.....	32
5.1 Conservation and Restoration of Biodiversity	32
5.2 Potential Impacts on Protected Areas.....	33

6.	Other Aspects of Pollution	34
IV. INFORMATION ON SOCIAL ISSUES AND OUR PEOPLE		35
1.	Employment.....	35
1.1	Employees.....	35
1.2	Employment Contract Types.....	37
1.3	Dismissals	38
1.4	Average Remuneration of the Workforce.....	38
1.5	Gender Pay Gap.....	44
1.6	Average Remuneration of Board Members and Senior Management	45
1.7	Right to Disconnect from Work.....	45
1.8	Employees with Disabilities.....	45
2.	Organisation of Work.....	45
2.1	Working Time.....	45
2.2	Absenteeism	46
2.3	Work-Life Balance and Shared Parental Responsibility.....	46
3.	Health and Safety.....	46
3.1	Workplace Health and Safety Conditions.....	46
3.2	Workplace Accidents and Occupational Diseases.....	47
4.	Social Relations.....	47
4.1	Social Dialogue and Promotion of Employee Involvement in Management	47
4.2	Collective Bargaining Agreements	48
5.	Talent Development and Management.....	48
5.1	Training and Learning.....	48
5.2	Internal Promotion	49
5.3	Performance Evaluation	49
5.4	Succession	49
6.	Equality.....	49
6.1	Promotion of Equal Treatment and Opportunity between Women and Men.....	49
6.2	Equality Plans.....	50
6.3	Prevention of Sexual and Gender-Based Harassment	50
6.4	Universal Accessibility for People with Disabilities	51
V. INFORMATION ON RESPECT FOR HUMAN RIGHTS, CORRUPTION, AND BRIBERY		51
1.	Introduction.....	51
2.	Due Diligence and Prevention Procedures.....	51
2.1	Training and Awareness.....	51
2.2	Annual Responsible Declarations on Compliance and Contacts with Authorities and Public Officials	52
2.3	Document of Receipt and Acceptance of the Decalogue of Our Ethical Code	52

2.4	Responsible Declaration of the Supplier Ethical and Social Charter	52
2.5	Compliance Channel.....	52
2.6	Supplier Ethical Channel.....	52
3.	Contributions to Associations, Foundations, and Non-Profit Entities	53
VI. INFORMATION ON SOCIETY AND OTHER STAKEHOLDERS.....		53
1.	Introduction.....	53
2.	Sustainable Development.....	53
2.1	Employment and Local Development	53
2.2	Local Populations and Territories.....	54
2.3	Local Communities and Communication Channels.....	55
2.4	Associations and Sponsorship.....	56
3.	Subcontracting and Suppliers.....	56
3.1	Social, Gender Equality, Environmental, and Corporate Responsibility Issues	56
3.2	Supervision and Audits of Suppliers	57
4.	Consumers.....	58
4.1	Measures for Consumer Health and Safety	58
4.2	Complaints, Grievances, and Resolutions.....	59
5.	Fiscal Information.....	61
5.1	Results Achieved	61
5.2	Taxes	61
5.3	Public Subsidies.....	61
VII.	ANNEX I. INDEX OF CONTENTS REQUIRED BY LAW 11/2018, OF 28 DECEMBER.....	62

I. INTRODUCTION

The Non-Financial Information Status Report (hereinafter referred to as "the Report") of the Nueva Pescanova Group (hereinafter referred to as "the Group" or "Nueva Pescanova Group") has been prepared by the Board of Directors of the parent company (Nueva Pescanova, S.L.) in accordance with the provisions and content outlined in the Spanish Commercial Code and Royal Legislative Decree 1/2010 of 2 July, which approves the consolidated text of the Companies Act. The Report is part of the Management Report corresponding to the *financial year ended 31 March 2024*, as presented in the Consolidated Annual Accounts of Nueva Pescanova, S.L.¹.

This Report includes information on environmental, social, and employee-related matters, as well as topics related to human rights, anti-corruption, bribery, and other aspects of the Group's operations, in compliance with the requirements established in the Spanish Commercial Code and the Companies Act. It also adheres to the Global Reporting Initiative (GRI) framework for international standards.

The scope of the information in this Report encompasses all subsidiary companies of Nueva Pescanova, S.L., which are included within the Group's consolidated framework, as appropriately detailed in the Consolidated Annual Accounts.

II. GENERAL ISSUES ON THIS NON-FINANCIAL STATEMENT FOR THE FINANCIAL YEAR ENDED MARCH 31, 2024

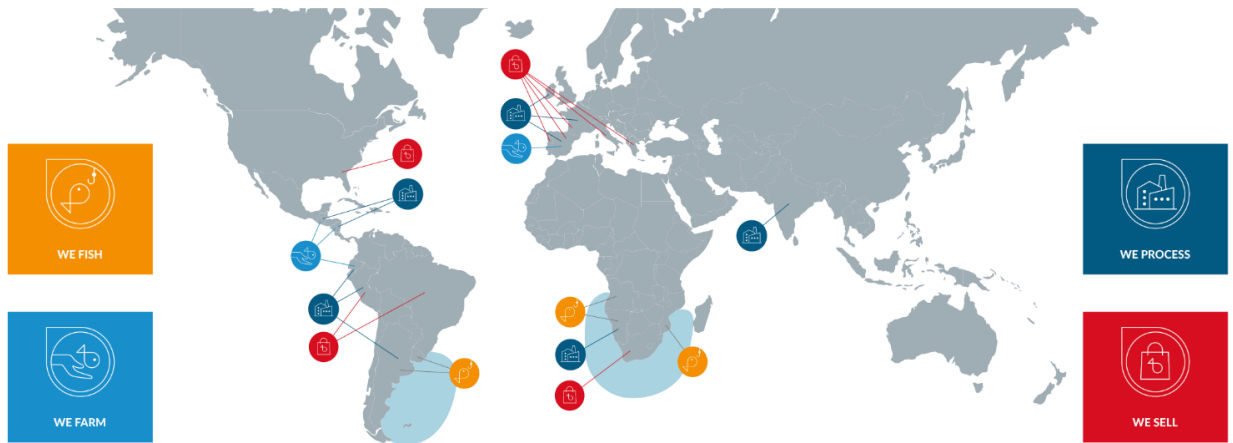
1. Business model

1.1 Overview and major markets

The Nueva Pescanova Group is a Spanish multinational company engaged in capture fisheries, aquaculture, processing, and commercialization of seafood products.

With more than 10,000 employees on average in this financial year, the Group companies are present in 16 countries (at the closing of the reporting period) on four continents, selling almost 70 seafood species in 80 countries in the five continents.

¹ In accordance with the provisions of article 28 of the Articles of Association of Nueva Pescanova, S.L., financial years will begin on April 1 of each year and will end on March 31 of the following year.



Over the years, the Nueva Pescanova Group has undergone a complete transformation to strengthen the application of sustainability criteria across all its activities, creating its current **DNA**, which is based on three core pillars:



1. Together we work to be the best food company in the market by bringing the freshness of the sea to the consumer's table.

The Group has a unique position in the sector due to its level of vertical integration. Controlling seafood products from the origin to commercialization is one of our key differentiating values, allowing traceability throughout the entire chain to always offer the best quality to consumers.



WE FISH

With **59 own fishing vessels** in the best fishing grounds in the Southern Hemisphere :

Argentine red shrimp, cephalopods and hake, among others, in South America.

Prawns, Cape hake and kingklip, among others, in Africa.



WE FARM

On 7.000 ha of farming area:

Vannamei shrimp in Ecuador, Guatemala and Nicaragua.

Turbot in Spain.



WE PROCESS

In **17 processing plants** located in **10 countries**:

Spain, Peru, Ecuador, France, Namibia, Nicaragua, Guatemala, Argentina, Ireland, and India.



WE SELL

In **80 countries** of 5 continents.

Our commercial branches are located in :

Spain, France, Greece, Italy, Portugal, USA, Peru and South Africa.

During the fiscal year ending on March 31, 2024, a new CEO has been incorporated into the Nueva Pescanova Group, and a Management Committee has been formed. Additionally, during the final months of this fiscal year, a Strategic Plan has been developed, focusing on the next two years. The plan is structured around four strategic pillars:

- **Commercial Strategy:** The goal is to improve the commercial margin by promoting best practices across the various markets and channels in which we operate. Some of the key actions include reorganizing the commercial structure, rationalizing the portfolio, and refocusing the marketing and communication strategy.
- **Focus on Operations and Origin:** The aim is to achieve operational excellence in service and cost at both the fishing and aquaculture origins, as well as in the processing plants at origin and destination.
- **Reorganization of the Structure and Talent Plan:** The Group's objective is to attain a lean, agile, and dynamic structure capable of anticipating and successfully responding to the changing market dynamics in which we compete. This will be supported by the implementation of a new Talent Plan.
- **Business Transformation:** Through the Business Transformation Office, we will accelerate operational transformation across transversal projects, capturing value throughout the entire value chain.

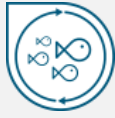
With the application of this Strategic Plan, the Group will solidify its position as a leader in the marketing of seafood products, based on an agile and dynamic organizational structure, leveraging the Group's knowledge and experience across all activities in its value chain.



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

The Group has spent over 60 years making innovation, freshness, and quality the hallmarks of the **Pescanova** brand, which ranks among the top 10 most chosen brands by Spanish consumers and holds 5th place in the food brand penetration ranking in Spanish households.

Since 2021, the Group has had the **Pescanova Biomarine Center**, the first private aquaculture research centre in Spain, located in O Grove (Pontevedra). This centre is a reference in improving health, nutrition, animal welfare, sustainability, and the study of new aquaculture species. It was created with the goal of collaborating with other public institutions (such as universities) and private entities to foster technological development and research in the field of aquaculture.



3. We are committed to the sustainability of natural resources and of our partner communities, whose trust we build and maintain by acting ethically and creating value.

Respect for the *Planet* and the *Communities* where the Group operates, the *People* working within it, and the commitment to the markets through our *Products* are the pillars that form the foundation of our *Corporate Social Responsibility strategy*, which is outlined in the *Corporate Social Responsibility Policy of the Nueva Pescanova Group*.



PLANET

The sustainable management of natural resources and respect for ecosystems and the environment to ensure their availability and quality for future generations, guarantees the operational success and future of our Group.



PEOPLE

Respect for diversity, safety, professional growth and pride of belonging to the Group are the bases for our success and for maintaining trust in our relationships with suppliers, clients, consumers and communities.



PRODUCT

We supply the markets with nutritious, healthy, tasty and innovative seafood products, produced responsibly.



COMMUNITIES

Aware of the value of seafood products, we strive to develop more prosperous communities, generating wealth, job opportunities and training wherever we are present.

In September 2022, Nueva Pescanova, S.L. established the *Nueva Pescanova Foundation*, a non-profit entity whose objective is to contribute to the sustainable development of the seafood industry and to promote, develop, and execute all types of initiatives related to fishing, aquaculture, processing, and marketing activities that contribute to sustainability in its social, environmental, and economic dimensions. Additionally, the foundation will promote R&D and knowledge dissemination within the seafood industry. In April 2023, it publicly announced its first contribution to the sustainable development of the seafood industry by organizing the *Global Sustainable Seafood Galicia Forum*.

1.2 Business Environment, Competitive Framework, and Future Trends

The projected increase in global population and economic growth will drive the demand for food, particularly animal-based protein. By 2030, the global population is expected to reach 8.5 billion, and 9.7 billion by 2050, resulting in a rise in demand for marine protein.

Aquaculture is the response to the growing demand for marine protein, while fishery production will maintain stability, subject to the ongoing search for sustainability and conservation of resources. In this regard, as highlighted by FAO analyses, aquaculture is expected to account for 53% of total seafood production and 59% of seafood available for human consumption by 2030.

1.3 Organization and Structure of the Nueva Pescanova Group

Nueva Pescanova, S.L. has a Board of Directors, organized into 3 advisory and consultative Committees (composed of both board members and certain senior executives of the Group), each of which has its corresponding internal operating regulations.



Governance, Responsibility, and Sustainability Committee

This committee is responsible for matters related to appointments, corporate social responsibility, corporate governance and organization, remuneration, business ethics, institutional integrity, regulatory compliance, and non-financial reporting.



Audit, Control, and Finance Committee

This committee is responsible for risk management, the internal control system, financial reporting, the preparation of annual accounts, and overseeing the work of the external auditors.



Commercial and Strategy Committee

This committee is responsible for the commercial strategy and ensuring the implementation of the Group's Strategic Plans.

At the corporate level, the Management Committee is composed of the CEO and the General Directors of the following areas: Fisheries; Aquaculture; Commercial, Marketing and Innovation; Finance, Systems, Communication and CSR; Operations; People; Business Transformation Office and Strategic Planning and PMO. In parallel with the Management Committee, there is the Upstream Management, which also reports hierarchically to the CEO.

On the other hand, certain functions report directly to the Chairman of the Board of Directors of Nueva Pescanova, S.L., such as the Legal and Compliance Department and the Internal Audit Department.

Regarding the ownership structure of the Group's parent company, ABANCA Corporación Bancaria, S.A. is the majority shareholder with more than 97% of its share capital.

2. Corporate Social Responsibility (CSR)

The *Group's CSR Master Plan* is based on our *DNA*: "commitment to the sustainability of natural resources and the communities where we are present, acting ethically, maintaining their trust, and creating value." It is grounded in respect for the *Planet*, the personal and professional development of the *People* within the Group, our commitment to the markets through our *Products*, and our contribution to improving the quality of life in the *Communities* where we operate. All of this is done while ensuring the comprehensive observance of principles of *business ethics*, *institutional integrity*, and applicable *regulatory compliance*, as established in our *Code of Ethics* and other provisions of our *Corporate Governance and Compliance Regulatory System*.

Our *CSR Strategy* also places great emphasis on our *Partners*, who make the existence and growth of the Group possible, on our stakeholders, and on *Society* as a whole, addressing their changes and

demands, which are particularly sensitive to the *environmental impacts* of business activity, *fair and equitable treatment of workers* and *social rights*, and *good corporate governance*, all in line with ESG criteria.

We continue to measure the progress of sustainability objectives, which have been established based on priority material aspects, with their goals quantified and deadlines set for their achievement. In this process, the performance measurement presented in our Non-Financial Information Statements (EINF, in Spanish) has been crucial, and we communicate compliance through our annual Progress Report on Sustainability.

2.1 Materiality

At the Group, we aim to align our CSR and Sustainability strategies with the expectations expressed by our stakeholders through a materiality analysis.

We have followed the methodology proposed by the *Global Reporting Initiative* (GRI 101) for defining relevant aspects, consulting with internal and external stakeholders, prioritizing and identifying material aspects, and validating them. The detailed methodology and other relevant information are published in the *2023 Materiality Analysis Report*, available on our corporate website.

The Group has defined, from a total of 27 relevant topics identified, the 13 material aspects, among which four aspects are essential for the Group:

- ET3 RESPONSIBLE FISHING AND AQUACULTURE:** *Ensure responsible fishing and aquaculture operations, complying with FAO principles and legal, reported, and regulated fisheries.*
- PR1 FOOD SAFETY AND QUALITY:** *Ensure safe processes and effective controls to deliver high-quality seafood products that customers and consumers can trust.*
- PE3 HEALTH AND SAFETY:** *Safeguard the physical and moral integrity of the Group's professionals at all times and in all situations.*
- PL4 SUSTAINABLE FISHING AND AQUACULTURE:** *Promote sustainable and transparent fishing and aquaculture practices, including animal welfare and sustainable feed for aquaculture.*

Regarding environmental sustainability, four key aspects stand out:

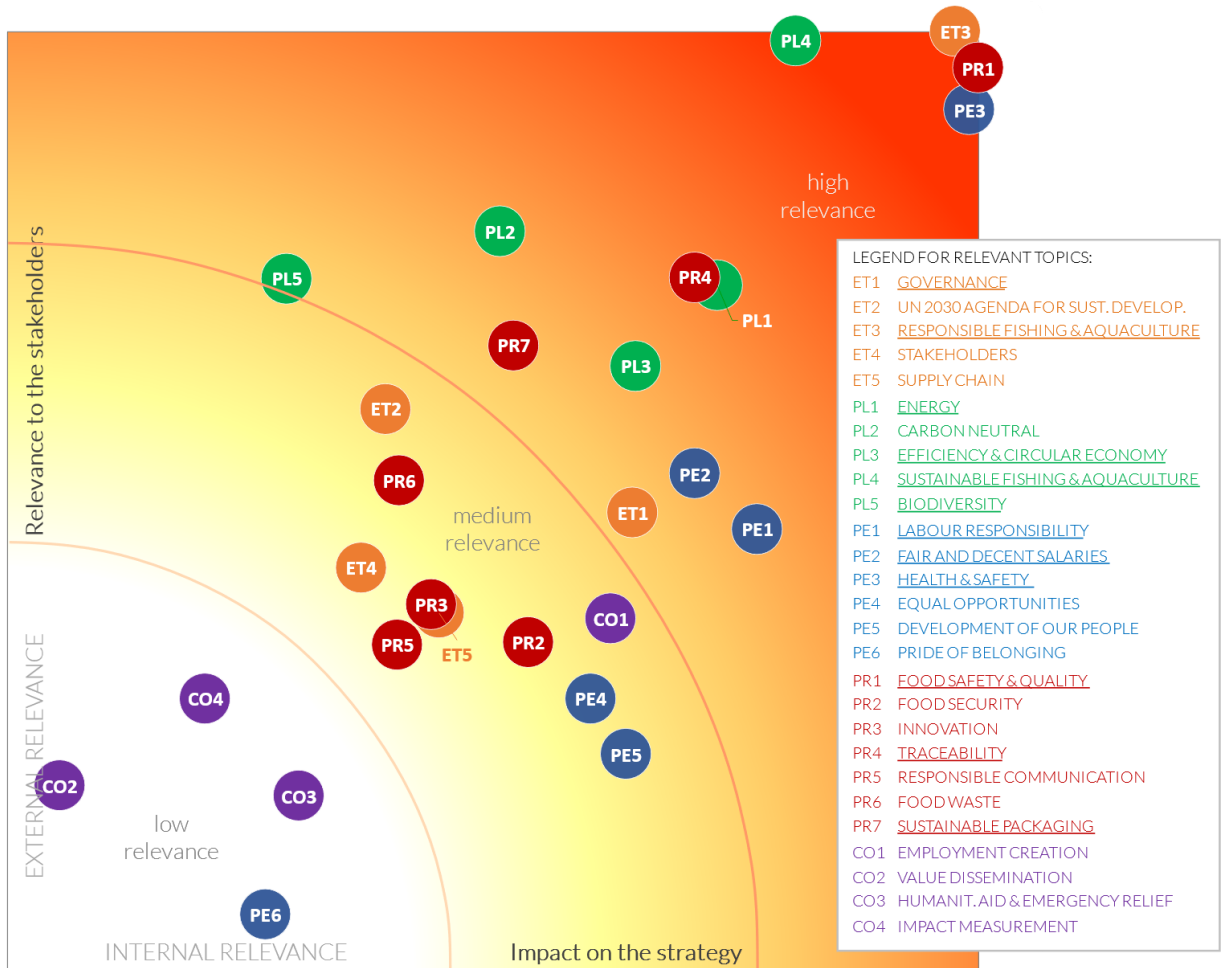
- PL1 ENERGY:** *Optimize energy use, transition to renewable energy sources, and reduce the energy intensity of our products and processes.*
- PL2 CARBON NEUTRAL:** *Reduce the carbon footprint of our processes and drive environmental compensation projects with the goal of carbon neutrality by 2040.*
- PL3 EFFICIENCY AND CIRCULAR ECONOMY:** *Efficiently manage water and materials, minimizing waste and discharges, ensuring proper treatment, and promoting circular economy solutions.*
- PL5 BIODIVERSITY:** *Promote projects and measures for biodiversity conservation and the improvement of ocean health and productivity.*

Three basic principles related to quality, decent, and safe employment are also identified:

- PE1 **LABOUR RESPONSIBILITY:** *Establish responsible and transparent labour relations.*
- PE2 **FAIR AND DECENT WAGES:** *Promote fair and decent wages, along with a transparent compensation and benefits system*
- ET1 **GOVERNANCE:** *Strengthen good governance by improving the implementation and communication of our policies.*

For the aspects related to our products, we highlight:

- PR4 **TRACEABILITY:** *Implement tools and systems to guarantee traceability of information regarding legality, food safety, sustainability evidence, and others related to our raw materials, ingredients, products, and the processes used.*
- PR7 **MORE SUSTAINABLE PACKAGING:** *Promote the use of reusable, recyclable, or compostable packaging*



Matrix of Relevance and materiality of the Nueva Pescanova Group:

ET - Ethics, Integrity, and Compliance; PL - Planet; PE - People; PR - Product; CO - Communities.

2.2 Commitments, Targets, and Sustainability Objectives

In May 2021, the Nueva Pescanova Group set its commitments and defined its sustainability objectives. The measures implemented by the Group's companies related to their fulfilment within the established time frame are subject to monitoring, measurement, and reporting.

Among the established objectives, we highlight the target of 100% sustainable sourcing of fishery and aquaculture raw materials in our products and the certification of all work centres under environmental management, quality, or food safety standards by 2030, as well as the target of achieving carbon neutrality for scope 1 and 2 emissions by 2040, through a 3% annual reduction in carbon footprint (scope 1 and 2), aiming for a 30% reduction by 2030 and 50% by 2040, based on the 2020 baseline, and gradually offsetting residual emissions.

Additionally, other immediate and ongoing objectives were defined, such as the rational use of water, waste management, organic by-product recovery, measuring efforts to reduce food loss, and ensuring labour responsibility for the entire Group's workforce.

2.3 Programmes

To ensure compliance with the established commitments, we have advanced in the development and implementation of the *'Pescanova Blue' Sustainability Programme*, the *Responsible Action Programme (PAR)*, the *Measurement and Performance Programme*, the *Transparency in Sustainability Programme*, and the *Environmental Compensation Programme*, thus enriching our CSR Master Plan and the Group's Sustainability Strategy, as detailed below in this document.



Scheme for the integration of the Sustainability, Measurement and Performance, Environmental Compensation, Responsible Action, and Transparency in Sustainability Programmes into the CSR Master Plan, originating from the Group's DNA and the guiding CSR principles: Planet, People, Product, and Communities, applying the defined Corporate and Sectoral Policies.

2.3.1. 'Pescanova Blue' Sustainability Programme

The *'Pescanova Blue' Sustainability Programme* represents the Group's operational response to its four CSR pillars: **Planet, People, Product, and Communities**. This programme ensures the transparent documentation of all efforts made by the Group to ensure its operations and products become more sustainable. To achieve this objective, the **Nueva Pescanova Group**

Corporate Sustainability Policy has been established as a governance tool aimed at aligning the Group's activities with:

- **Five sustainability principles** covering sustainable sourcing, responsible operations, labour responsibility, prosperous communities, and ethical and integral behaviour aligned with regulatory compliance obligations and objectives.
- The concept of **sustainability evidence**, through a system for recognising environmental, social, and economic evidence, which serves to demonstrate compliance with the five principles.
- An **integrated plan of initiatives** designed to guide and document the sustainable use of natural resources and the responsible conduct of activities across the Group's businesses.

In relation to sustainable sourcing, the 'Pescanova Blue' Sustainability Programme develops and recognises four types of sustainability evidence:

- **Type I – Third-party audit certifications** from private sustainability standards (ecolabels) for fishing or aquaculture that align with the FAO's principles of responsible fishing, such as certification schemes recognised by the Global Sustainable Seafood Initiative (GSSI).
- **Type II – Compliance with the requirements of the Group's Private Sustainable Fishing Standard** in countries or for species where it is applicable.
- **Type III – Complementary actions in fishing and/or aquaculture sustainability**, such as Fishery Improvement Projects (FIPs) or Aquaculture Improvement Projects (AIPs) that are transparently and appropriately managed and documented.
- **Type IV – Adherence to performance evaluation criteria for fisheries** based on globally accepted sustainability measures, as defined by the scientific profiles on the *FishSource* platform.

Each year, we publish the *Progress Report on Sustainability Goal Compliance* (available on our corporate website), detailing the sustainability evidence identified in both the fishing and aquaculture sectors in relation to the Group's sustainable sourcing practices. We have also **set a target to ensure 100% of our products carry sustainability evidence by 2030**.

In addition, we have collaborated on the development of the *Seafood MAP platform*, promoted by GSSI—a new tool designed to generate alternative sustainability evidence based on responsible practices across various sustainability domains.

The certification of facilities and processes involved in the procurement, handling, and transformation of seafood and raw materials is an integral part of our commitment to sustainability, responsibility, quality, and food safety.

Environmentally responsible processing that respects both the environment and the product can be verified through third-party audits under private environmental management, quality, and food safety standards. These certifications demonstrate compliance with the principles defined in such standards.

Through our *Corporate Policies on Sustainability, Environmental Responsibility, and Quality and Food Safety*, we have committed to certifying all facilities, processes, and products under sustainability, environmental, and quality and food safety standards. This commitment aligns

with our principles of sustainable sourcing and responsible operations, with 2030 as the target for achieving this objective. We will continue to report progress toward this goal.

2.3.2. Measurement and Performance Programme

As part of the Group's commitment to responsible and transparent communication and accountability to both internal and external stakeholders, we work each year to improve and expand the information on our performance.

Measuring the consumption and emissions from our activities has proven to be an essential tool for understanding the scale of our environmental footprint, the potential impact on environmental quality, and the availability of natural resources. This measurement allows us to identify critical points in the value chains associated with our products and make informed decisions to focus efforts on reducing operational and reputational risks, minimizing our impacts, and compensating for those that cannot be avoided. We base our data collection and communication of the resulting information on criteria and principles outlined in standards or methodologies that enable the comparison of reported indicators over successive periods and with those of other organizations.

Finally, we use the GRI content criteria to develop quantitative indicators for voluntary reporting in our sustainability reports, covering sustainable development, measurement, progress, and performance.

2.3.3. Environmental Compensation Programme

We differentiate between two types of compensation: (i) *Compensation for impacts* associated with the consumption and emissions resulting from our activities and presence; and (ii) *Biodiversity compensation* focused on restoring ecological functions, habitats, and species potentially negatively affected, to safeguard the ability to provide the associated ecosystem services.

Our mitigation and compensation measures for environmental footprints, as well as climate change adaptation, underpin most of our actions aimed at improving equipment and process efficiency, optimizing the use of energy and natural resources, and minimizing the generation of emissions, waste, and discharges.

We have invested in knowledge development and the quantification of initiatives targeting greenhouse gas (GHG) emissions compensation through CO₂ capture and storage actions. Notably, this includes reforestation projects with native species, including various tree species and mangroves, in the areas of our shrimp farm estates in Ecuador, Guatemala, and Nicaragua.

Additionally, the offset actions carried out on the farms of our Nicaraguan subsidiary have been quantified by local forestry experts. The assessment of GHG emission offsets through CO₂ capture by forests and forested areas is part of the Environmental Compensation Programme, with the dual objective of promoting offset actions and measuring progress toward achieving the Group's carbon neutrality goal set for 2040.

In this context, for plantation areas in Nicaragua (with hectares of mangroves and teak plantations), Ecuador, and Guatemala (mangrove hectares), the estimated CO₂ capture and storage reached up to 14,396.4 tCO₂ (in native mangrove forests) and up to 4,860.1 tCO₂ (in teak forest). Furthermore, we have initiated and characterized additional projects with complementary objectives, including maintaining nurseries for endemic plants and collaborating on local reforestation initiatives using seedlings produced in these nurseries.

2.3.4. Responsible Action Programme

Through the *Responsible Action Programme (PAR)*, we have inventoried and documented responsible actions undertaken by the Group across four general plans inspired by the guiding principles of our *CSR Master Plan*:

- 'Our Common Planet'.
- 'People First'.
- 'Product Excellence', and
- 'Growing Together with the Communities'.

2.3.5. Transparency in Sustainability Programme

We aim to communicate our commitments, objectives, and targets, along with progress made in achieving these goals and other relevant aspects regarding the planning and execution of projects and action plans across various sustainability topics, to our stakeholders. Updates on the progress of our Sustainability Goals are made publicly available through our corporate website and other public platforms. Additionally, we uphold our commitment to "transparency and accountability," as stated in our various Corporate and Sectoral Policies, which are also accessible on our corporate website.

During the fiscal year covered by this report, we made progress on the digital traceability project under the Global Dialogue on Seafood Traceability (GDST) standard. This initiative integrates criteria for food safety, legality, and sustainability evidence within IBM's Food Trust™ platform. In Phase II of the project, we completed its implementation for: *Argentinian shrimp*, from fishing operations conducted by our subsidiary Argenova, and *Vannamei shrimp*, from cultivation and processing by our Ecuadorian subsidiary Promarisco, through to transportation to the transformation centres of Pescanova Spain.

We have launched Phase III, focusing on implementing the necessary processes for the reception, transformation, and final packaging of these products at our industrial facilities in Arteixo, Catarroja, Chapela, and Paterna. Additionally, groundwork has begun for integrating logistics and storage platforms within Spain.

We have also collaborated with Gradiant to design and implement a collaborative platform that allows us to collect the data required by the GDST standard for third-party suppliers and send it to the IFT platform.

It is important to highlight that, with the goal of participating in the global dialogue on traceability, the Group is part of the governing bodies of GDST and has participated in various

awareness-raising events on the importance of traceability in the seafood sector, such as the SENA 2024 fair in Boston.

Throughout the fiscal year ending March 31, 2024, we have made all information related to the programs that form part of the *Corporate Social Responsibility (CSR) Strategy of the Nueva Pescanova Group* publicly available through our corporate website, as well as through the development and maintenance of content for the websites of the companies that make up the Group.

On the Pescanova online campus, various CSR-related courses are available to internal staff under the *CSR Academy* section.

2.4 Contribution to Sustainable Development

The *CSR Master Plan*, through the '*Pescanova Blue*' Sustainability Programme and the *Responsible Action Programme*, aligns with the UN 2030 Agenda. This alignment has been concretized by adopting commitments to the *Sustainable Development Goals (SDGs)* in all our activities, further reinforced by our participation in the *Global Compact* through its Spanish Network.

2.5 Recognitions

World Benchmarking Alliance (WBA)

The World Benchmarking Alliance (WBA) recognized us for our significant contribution to sustainable development and the UN 2030 Agenda, promoting more sustainable and inclusive supply chains in the sectors we are involved in.

Our commitments to governance and strategy, traceability, respect for natural ecosystems, biodiversity and the environment, social responsibility, nutrition, and transparency have been recognized in the following benchmark evaluations:

- The *Seafood Stewardship Index* measures how the world's leading seafood companies contribute to the sustainable management of oceans and coastal ecosystems and implement responsible social practices. In the 2023 Seafood Stewardship Index ranking, we achieved 1st place globally among fishing companies and 2nd place among the 30 most influential seafood companies, improving our position compared to the 2021 ranking (3rd globally) and the 2019 ranking (5th globally).
- The *Food and Agriculture Benchmark* encourages the 350 most influential food and agriculture companies globally to apply sustainable business practices across all their operations, as well as using their influence to encourage value chain partners to do the same. In the 2023 Food and Agriculture Benchmark ranking, we secured 2nd place among animal protein producers, 12th place among food and beverage manufacturers/processors, and 16th place globally among the 350 companies evaluated. We have improved our position compared to the 2021 ranking, where we were ranked 5th (+3), 30th (+18), and 40th (+24), respectively.
- The *Nature Benchmark* examines how companies' impacts contribute to stable and resilient ecosystems that allow humanity and nature to coexist within planetary

boundaries regarding biodiversity, climate, land, oceans, and water. In 2023, we ranked 28th globally among the 350 companies analysed in this first edition of the Nature Benchmark.

Global Child Forum (GCF)

- In 2023, the *Children’s Rights Benchmark from the Global Child Forum (GCF)* evaluated us for our performance in minimizing the risk of significant impacts on children’s rights. Our result classifies us as “Achievers,” meaning we have developed and implemented several policies and practices that address the organization’s impact on children’s rights.

3. Certifications

The Group holds various specific certifications in the areas of aquaculture and fisheries sustainability, environmental management, labour, food safety and quality, among others, with the following being particularly notable:



Certifications Map of the Nueva Pescanova Group.

3.1 Certifications for Aquaculture and Fisheries Sustainability

Regarding aquaculture, the Group holds sustainable aquaculture production certifications, such as:

- *GLOBALG.A.P.*, *BAP* and *ASC* in Ecuador y Nicaragua.
- *BAP* and *ASC* in Guatemala.
- *GLOBALG.A.P.* for turbot farming in Spain.

For fisheries, the Group holds:

- *Marine Stewardship Council (MSC)* certification for the Cape hake fishery in Namibia.

3.2 Environmental Management System Certifications

The certifications related to environmental management within the Group are:

- *ISO 14001* in 6 industrial and aquaculture centres in Spain.
- *EMAS* for turbot farming in Spain.

3.3 Certifications in Labour Practices

Labour practices on the fishing vessels have been accredited through:

- *FISH (Fairness, Integrity, Safety and Health) Standard for Crew*. The Group holds this certification for its fishing fleet in Namibia and is currently preparing for the audit of this certification for its fleet in Argentina.

Regarding work systems and occupational health, the workplaces in Spain are currently certified in:

- *ISO 45001*, which certifies best practices in occupational health and safety.
- *5Z Excellence (Zero Accidents, Illness, Waste, Inequality, and Ignorance)*, awarded by the International Foundation ORP (FIORP). This certification recognizes and values the Group's commitment to building a corporate culture focused on safety, sustainability, health, uniqueness, and sensitivity.

Additionally, certain subsidiaries of the Group, such as Promarisco in Ecuador, Camanica in Nicaragua, and Insuiña in Spain, hold:

- *GRASP (GLOBALG.A.P. Risk Assessment on Social Practices)*, a module that assesses social practices in operations, addressing specific issues related to the health, safety, and well-being of workers. It is a tool that helps companies demonstrate their compliance with labour laws, both international and national. Full compliance has been verified (classified as "Fully Compliant").

3.4 Food Safety and Quality Certifications

Our Food Safety, Quality, and Environmental Management Systems (SACMA) are based on compliance with the requirements established in the most demanding, advanced, and prestigious international standards and references:

- *(IFS) International Featured Standards – Food:* This certification guarantees the quality and safety of our food products, providing the highest level of protection to customers and consumers while meeting stringent safety and quality demands. The Group holds this certification in its industrial centres and processing plants for vannamei shrimp and turbot.

In addition to implementing this reference, certain plants or centres within the Group also hold other certifications to properly meet customer requests, align with recommendations from competent authorities, or implement specific strategies within the Group in this regard.

Beyond external audits, the Group conducts its own internal audits, primarily aimed at monitoring compliance with current legislation and certified standards, identifying deviations, and implementing corrective actions. From April 1, 2023, to March 31, 2024, a total of **56 internal audits** have been carried out.

3.5 Other Certifications

Subsidiaries of the Group, such as Novaguatemala in Guatemala, Novaperu in Peru, Promarisco in Ecuador, Skeleton Coast Trawling in Namibia, and the industrial centre in Porriño, Spain, are members of the platform:

- **SMETA/SEDEX**, which demonstrates their responsible performance and recognition from an ethical, social, and environmental perspective. This certification covers the principles of the ETI (Ethical Trading Initiative) Code, including the prevention of forced, slave, and child labour, freedom of association, safe and hygienic working conditions, and aspects related to foreign labour, subcontracting, remote work, anti-corruption efforts, and environmental management.

4. Business Ethics, Institutional Integrity, and Regulatory Compliance

Our commitment to the principles of business ethics, institutional integrity, and regulatory compliance of the highest standards is directed through our *Corporate Governance and Compliance Regulatory System* (or *Internal Regulatory System*), which includes our *Code of Ethics*, the Group's *Ethical and Social Supplier Charter*, the Governance Rules of Social Bodies and other Internal Committees, Corporate Policies (Global), Policies (Sectorial or Local), and Internal Regulations. This area also highlights our *Corporate Policy on Criminal Risk Prevention* and our *Anti-Corruption Code*.

Regarding criminal risk prevention, at the corporate level, we have a *Criminal Risk Prevention Programme* implemented in accordance with the requirements of the organizational and management models for criminal risk prevention set forth in Article 31 bis of the Spanish Penal Code, as well as for the prevention of criminal behaviour that result in the imposition of additional

consequences under the terms established in Article 129 of the same legal text. Our Corporate Programme is structured, among others, in accordance with the following components:

- A *Regulatory Framework* integrated by the Spanish Penal Code and the Organic Law on Smuggling Suppression; the internal regulatory documents forming part of our *Penal Internal Regulatory System*; the *Matrix of Inherent Criminal Risks*; the *Matrix of Control Activities and Controls*; and the *Matrix of Residual Criminal Risks*.
- From an organizational model perspective for Compliance risk management, the Group's *Compliance Unit* is a collegial internal body with autonomy and independence of action. The Board of Directors of the Group assigns it, among other functions, to ensure effective respect for and compliance with our ethical standards, integrity, and regulatory compliance.

5. Risks Related to the Matters Included in Non-Financial Information

The Group, like any other multinational group of its size and geographic diversity, is subject to various risks in the different countries, activities, and markets in which it operates. Therefore, the relevant corporate risks are properly identified, assessed, and controlled, with the necessary mechanisms and principles established for their proper management. This ensures a level of risk that allows the Group to achieve its strategic objectives while integrating risk management into the relevant corporate and business processes, undertaking proactive management of these risks.

Thus, the *Nueva Pescanova Group's Risk Management System*, established and approved by the Board of Directors of Nueva Pescanova, S.L., is based on the general principle of comprehensive risk management. This includes ongoing activities of identification, quantification, control, monitoring, communication, and disclosure of the most relevant risks that could affect the Group, as well as the mitigation and transfer actions established to manage them, all with the mission of helping the Group achieve its objectives.

To this end, the Group maintains an inventory that records the most relevant risks that could affect it, grouped into different categories according to their nature (environmental risks, strategic risks, operational risks, compliance risks, and reporting risks). Periodic updates are carried out on this inventory. All risks in the inventory are assigned to their respective manager (risk owner) and quantified in terms of impact and probability to determine which represent the highest risk levels and prioritize their management.

For this entire process, the Group uses a risk management technology tool, which allows the risk inventory to be maintained and updated, and the periodic quantification process to be carried out. Additionally, this tool enables risk owners to report monthly information related to the managed risks, including whether events linked to the identified risks have occurred, or the status of the mitigation and transfer actions associated with each risk. The technology tool also enables audits and evaluations of the mitigation and transfer actions implemented for the identified risks.

This *Risk Management System* has a governance model composed of, among others, the following internal regulatory components (all of which have been approved by the Board of Directors of Nueva Pescanova, S.L.):

- ***Corporate Risk Management Policy of the Nueva Pescanova Group***: establishes the set of basic principles and the general framework for managing all types of risks faced by the Group.
- ***Risk Control and Management Manual***: develops the Corporate Risk Management Policy of the Group, establishing the methodology to be applied in the risk management process.
- ***Corporate Risk Appetite Statement***: establishes the maximum level of risk the Group is willing to accept in achieving its objectives.
- ***Inherent and Residual Risk Map***: contains the evaluation of the different relevant risks for the Group (classified into five categories as previously mentioned), considering their impact and likelihood of occurrence. These are then treated in the *Residual Risk Map*, which is developed after analysing the mitigation and transfer actions implemented by the Group for each of these inherent risks.

For managing the Group's risks, the Board of Directors of Nueva Pescanova, S.L. works with the Audit, Control, and Finance Committee, which, as an informative and consultative body of the Board, with no delegated functions, supervises and reports on the evaluation, control, and monitoring of relevant risks. This is done in coordination with the Corporate Internal Audit Department and the different Corporate Business and Support Divisions (risk owners), which are responsible for implementing specific risk policies and directly analysing and monitoring them. This is all done without prejudice to the powers of the Governance, Responsibility, and Sustainability Committee, which also has an informative and consultative role in governance, ethics, compliance, responsibility, and sustainability matters.

III. INFORMATION ON ENVIRONMENTAL ISSUES

1. General Issues

In our *2023 Materiality Analysis*, the priority identified is ensuring the most sustainable performance through the implementation of measures based on more efficient processes that are respectful of natural capital. This *Analysis* highlights the optimization of natural resource and energy use, meaning that we must produce more (biomass or packaged final product) and better (more efficiently and of better quality) with less (resources, energy, or waste), while respecting ecosystems and their biodiversity, and traceability as a tool for transparency.

Aligned with these material aspects, the Group has *Corporate Sustainability Policies*, *Environmental and Industrial Responsibility Policies*, and *Sectoral Policies for Fisheries and Aquaculture Responsibility*. It also maintains projects for the protection of the natural environment, conservation of biodiversity, and promotion of environmental improvement.

Aware of its environmental responsibility, as well as the potential impacts that its activities could have and the dependencies on nature, the Group is firmly committed to the protection and conservation of the environment, the prevention of pollution in all its activities, products, and services, and the preservation of the ecosystems it depends on. To this end:

- We set objectives that consider environmental aspects as an integral part of our business decisions.
- We comply with applicable legal requirements and other voluntarily assumed requirements in all our activities, products, and services.
- We promote the rational use of natural resources and their more sustainable management, minimizing waste generation and utilizing by-products in circular economy solutions.
- We promote continuous improvement of the *Food Safety, Quality, and Environmental Management System (SACMA)*.
- We develop training and/or awareness plans for our employees on food safety, quality, and environmental issues related to their work.
- We carry out communication and awareness actions about our policies to all individuals, implementing them and keeping them present at all levels of the organization.

In this regard, within the Group's organization, there is the Corporate Directorate of Quality, Food Safety, and Environment (part of the Group's General Operations Directorate). This Corporate Directorate is responsible for the prevention and minimization of our environmental risks in each of the Group's companies.

Additionally, the Group has an environmental liability insurance policy through which environmental damages and third-party pollution damages that may arise during our activities are covered. As of the date of this report, the Group has not recorded any provisions for risks and expenses nor contingencies related to environmental protection, as its risks are covered by the mentioned environmental liability insurance policy.

2. Sustainable Use of Resources

Optimizing the use of natural resources, including biological ones, aims to boost efficient production through more sustainable processes. Given its relevance to the Group's activities, already identified as key in the *Materiality Analysis*, we focus our commitment on the rational use of water, materials, and energy.

2.1 Rational Use of Water

The rational use of water in the different processes identified in the Group's companies is a cross-cutting operational management and environmental sustainability goal.

We distinguish between consumptive use (where water is used in a way that reduces its quality or quantity in some way) and non-consumptive use (where temporary use of water does not affect its quantity or quality, such as in aquaculture as a cultivation medium).

The following table represents the total volume of water used by source type, indicating the consumption or relative use of each of the Group's companies in the countries listed and the generic activity:

1 April 2023 – 31 March 2024			
Source	Volume of Water Used [x1.000 m ³]	Scope (countries)	Assigned Use
Consumptive use			
Surface water , including water from wetlands, rivers, lakes, and oceans	764.3	Ecuador and Spain	Industrial
Groundwater	780.5	Ecuador, Spain, Guatemala, Nicaragua and Peru	Industrial, human consumption, washing, and cleaning
Rainwater collected and stored directly by the organization	0.2	Mozambique	Washing and cleaning
Municipal water supplies or other public or private water services	966.0	Argentina, Ecuador, Spain, France, Mozambique, Namibia and Nicaragua	Human consumption, process, washing, and cleaning
Total	2,511.0 (3,150.5 in 2022/23; -20%)		
Water Use Efficiency Indicator [m ³ /t prod]	10.95 (13.25 in 2022/23; -17%)		
Non-consumptive use			
Surface water , including water from wetlands, rivers, lakes, and oceans	3,619,239.6 (4,608,692.4 in 2022/23; -21%)	Argentina, Ecuador, Spain, Namibia and Nicaragua	Culture medium in aquaculture farms, refrigeration equipment cooling

The Group undertakes projects related to the rationalization of water consumption, following best practices that improve cleaning processes and developing new ones that minimize water usage.

Furthermore, in response to compliance with various regulatory frameworks for controlling the environmental impacts of the industry, as well as environmental management and monitoring programs or measures identified in impact studies or environmental licenses, the Group treats the wastewater generated from activities at its work centres.

The Group has its own wastewater treatment plants at most of its industrial centres, replacing septic tanks, which helps reduce the generation of wastewater and the associated energy and financial costs of treatment.

Similarly, on the vessels in our fleet, we continue to treat black water and separate bilge water before discharge.

2.2 Rational Use of Materials

Responsible use of natural resources involves the daily management of the origin, quantity, and quality of raw materials. The Group quantifies for management and reporting purposes the performance indicators of those raw materials identified as relevant, which are classified as: (i) Main materials (such as fishery and aquaculture products), (ii) Auxiliary materials (used ingredients), and (iii) Packaging materials.

The raw material consumption efficiency indicator shows the conversion of raw materials into the final products resulting from the Group's most representative activities.

1 April 2023 – 31 March 2024	
Activity and Country	Indicator of Raw Materials Consumption Efficiency [kg RM/kg prod]
Aquaculture	
Ecuador	1.78
Spain	1.15
Nicaragua	2.29
Fishing	
Argentina	1.13
Mozambique	1.13
Namibia	1.43
Processing	
Argentina	1.11
Ecuador	1.10
Spain	0.91
France	1.18
Guatemala	1.61
Namibia	1.53
Nicaragua	1.01
Peru	1.36

2.3 Rational use of energy

Optimizing energy use is essential to improving the environmental performance of our activities. The Group has defined various measures aimed at reducing atmospheric environmental impact by lowering greenhouse gas emissions. These measures are directed at industrial reconversion, encouraging the substitution of more polluting fuels with less polluting alternatives in industrial equipment, and transitioning to energy from renewable sources. It is worth mentioning the generation of electricity in photovoltaic parks at the industrial sites in Spain (Arteixo, Chapela, Paterna, Porriño, Xove, and Pescanova Biomarine Center) and Namibia (Lüderitz and Walvis Bay), as well as on the automatic feeders in the farming facilities in Nicaragua.

Regarding energy efficiency in equipment and processes, notable examples include the use of more efficient water pumping equipment, LED lighting in work centres, industrial centres, and vessels, and the purchase of electricity under Power Purchase Agreements (PPA) from renewable sources.

The consumption indicators and energy intensity indicators for the Group's activities in the reporting period referred to in this report are provided in the table below:

1 April 2023 – 31 March 2024	
Energy Source	Energy Consumption [MWh]
Diesel	411,251.8
Natural gas	50,436.4
Other fuels	10,470.3
Electricity consumed	145,619.3
Total	617,777.8 (661,536.4 in 2022/23; -7%)
Electricity from renewable sources (46% , 35% in 2022/23; +11pp)	67,703.6 (59,264.0 in 2022/23; +14%)
Energy Intensity Indicator [MWh/t prod]	2.69 (2.78 in 2022/23; -3%)

The energy intensity indicator (energy consumption per weight of final product) by activity and country, for the year ended March 31, 2024, is presented in the following table:

1 April 2023 – 31 March 2024	
Activity and Country	Energy Efficiency Indicator [kWh/kg prod]
Aquaculture²	
Ecuador	3.8
Spain	7.1
Nicaragua	4.0
Fishing³	
Argentina	6.0
Mozambique	28.2
Namibia	4.2
Processing⁴	
Argentina	8.2
Ecuador	0.8
Spain	1.4
France	1.3
Guatemala	3.9
Namibia	1.3
Nicaragua	1.1
Peru	0.1

3. Circular Economy and Waste Prevention and Management

In the Group's various activities, the generated waste is classified, segregated, and managed, both in the fishing fleet, aquaculture farms, and processing plants, working with Authorized Waste Managers who are responsible for their proper treatment.

² The indicator depends on the production process (intensive/extensive) and the duration of the life cycle of the cultivated species.

³ The indicator depends on the specific consumption for propulsion, operation, and freezing on the vessels. The indicator for Mozambique reflects a lower catch/ship/day of fishing.

⁴ The indicator depends on the complexity of the processing line and freezing requirements.

3.1 Waste Generation at Nueva Pescanova Group

In its various fishing, aquaculture, and processing activities, the Group classifies the waste generated based on its hazardous nature and the type of recovery carried out. The following amounts were identified for the fiscal year ending March 31, 2024:

1 April 2023 - 31 March 2024	
Typology and Recovery	Amount generated [t]
Hazardous waste for authorized waste manager	461.6
Non-hazardous waste (of which):	26,710.5
Recycled	4,572.9
Composted	1,380.0
Recovered	1,477.0
For authorized waste manager	12,040.8
Valued organic by-products	8,936.8

According to best practices and applicable regulations, hazardous waste is handed over to authorized waste managers who ensure the most appropriate treatment available at each site.

3.2 Waste Prevention, Recycling, and Reuse Measures

In the different countries where the Group operates, there are plans and programs that contribute to improving environmental management related to waste prevention, recycling, and reuse.

In line with our *Waste Management Plans*, cardboard, plastic, glass, metal, oil sludge, and sand are segregated and handed over to the corresponding Authorized Waste Manager.

In industrial centres, efforts are also made to reduce the use of plastic materials and to recycle their waste by progressively replacing plastic materials with alternatives that contain recycled content or are more recyclable.

3.3 Other Forms of Waste Recovery and Disposal

To ensure the responsible and sustainable use of marine biological resources, the Group also promotes circular economy solutions for byproducts from fishing. The integral use of fish byproducts is considered essential to fulfilling this purpose. Therefore, the Group implements projects and fosters partnerships in countries where it operates in fishing, processing, and seafood product manufacturing to define **solutions for the valorisation of by-products** from these activities. These byproducts are incorporated into industries such as fishmeal and fish oil production or animal feed. Furthermore, these partnerships often contribute to job creation and the socio-economic development of the communities where we are present.

In this regard, it is important to highlight some byproduct valorisation initiatives:

- To produce animal feed from: **(i)** toothfish skins and heads at the Puerto Deseado industrial centre in Argentina; **(ii)** shrimp shells and heads in Ecuador and Nicaragua; **(iii)** fish heads and viscera collected in dedicated tanks on the new Novanam vessels, as well as bones, skins, and fish rejects at both facilities in Namibia; and **(iv)** various organic byproducts at some industrial centres in Spain.
- For soil improvement fertilizers from: **(i)** toothfish skins and heads at the Puerto Deseado industrial centre in Argentina; **(ii)** shrimp shells and heads at the Boulogne-sur-Mer industrial centre in France.
- Lastly, for biofuel production from shrimp shells and heads at the Lorient industrial centre in France.

3.4 Actions to Combat Food Waste

Fighting food waste is a priority and ongoing concern for a Group in the food sector such as ours. Continuing with our objective in this area, the Group continues to deepen agreements, operations, practices, and programs aimed at reducing food waste in the production process.

Reducing losses and organic waste generation at processing facilities, as well as preventing food waste in the Group's operations through continuous improvement in demand management and stock optimization, are key objectives for the organization.

Similarly, the Group has continued to work on making donations to non-profit organizations and institutions that collect food to meet the nutritional needs of disadvantaged individuals and communities, particularly those in precarious or socially excluded situations, as well as through collaborative efforts with the associations to which we belong.

4. Climate Change

The Group recognizes that the activities of its companies across various stages of the value chain and production process result in the emission of certain substances, including greenhouse gases (GHG), which, depending on their global warming potential, contribute to the greenhouse effect in the atmosphere and promote climate change.

For this reason, the Group has developed a *Decarbonization Plan*, which includes measures to reduce its carbon footprint: improving energy efficiency of combustion and electricity-consuming equipment, preferentially using materials and products that generate fewer emissions and consume less energy throughout their life cycle, energetically valorising the waste we generate, increasing the production and/or consumption of renewable energy sources, and reducing food loss and waste, as well as valorising by-products in all stages of our value chain.

The impact of climate change poses a risk to the results of fishing activities, both due to the potential decrease in ecosystem productivity, recruitment, and species growth, as well as their distribution in depth or geographically. In both cases, there is a possibility of impacts on securing access to marine-derived animal protein, as well as political impacts related to managing access to fishing grounds and resources.

Similarly, effects can be anticipated on the productive and regenerative capacities of extensive aquaculture due to interference with local ecosystem provisioning, regulatory, and support services.

It is important to highlight the Group's efforts through technological modernization and investment in new measurement, control, and operation optimization equipment to achieve maximum efficiency. For example, the *Acuicultura 4.0* project (digitalizing aquaculture to improve efficiency and sustainability) and the *SEA2TABLE 4.0* project (which promotes productive efficiency for a smart and sustainable food industry).

We collaborate with governments and scientific organizations to improve legal and biological management of marine resources, conserve the environment, and adapt to the effects of climate change. We work with people within the Group to change habits and adopt best practices with supply chains in search of better technical, material, and service solutions.

Supported by the methodology provided by the *Greenhouse Gas Protocol* of the World Business Council for Sustainable Development (WBCSD) and the World Resources Institute (WRI), direct and indirect emissions associated with the operations of the Group's companies for the year ending March 31, 2024, are reported. These emissions are classified into *Scope 1* (direct emissions) resulting from the operation of fossil fuel combustion equipment owned or controlled by Group companies; *Scope 2* (indirect emissions), emissions associated with the generation of purchased and consumed electricity; and *Scope 3* (indirect emissions), emissions caused by the transportation and cold storage of raw materials and products, emissions related to the production of aquaculture raw materials by third parties, waste management, business travel, and municipal water supply.

1 April 2023 – 31 March 2024	
GHG Emission Source	GHG Emission [t CO ₂ e]
Scope 1⁵	
Emissions from stationary sources	76,897.3
Emissions from mobile sources	69,447.4
Refrigeration and air conditioning	52,318.4
Total Direct Emissions Scope 1	198,663.1
Scope 2⁶	
Electricity Consumption	10,670.1
Total Indirect Emissions Scope 2	10,670.1
Total emissions Scope 1+2	209,333.2
(annual reduction target 3% Scope 1 and 2 Emissions)	(263,275.2 in 2022/23; -20.5%)
Scope 3	
External Aquaculture Production	15,428.4
Logistics – Transport	23,536.0
Waste Management	10,073.1
Logistics – Storage/Cold	531.9
Business Travel	1,512.0
Water Consumption	371.9
Total Scope 3 Indirect Emissions	51,453.3
Total emissions Scope 1+2+3	260,786.5
(carbon footprint, total emissions)	(315,040.8 in 2022/23; -17.2%)
GHG Emissions Intensity Indicator [tCO ₂ e/t _{PROD}]	1.14
	(1.32 in 2022/23; -13.6%)

The results obtained in the current year regarding the Group's carbon footprint indicate a 17.2% reduction in absolute CO₂e emissions and a 13.6% reduction in the relative indicator to production (KPI in tCO₂e/t_{PROD}). These results are on track to meet the annual emission reduction target for Scope 1 and 2 (up to 20.5%) and a cumulative reduction of 36.9% since the baseline year.



Reduce the carbon footprint (Scopes 1 and 2) by 3% annually, targeting a 30% reduction by 2030 and 50% by 2040, based on the 2020 baseline.

⁵ Source of the conversion factors used: DEFRA (2023) UK Government GHG Conversion Factors for Company Reporting (GHG reporting: conversion factors); IPCC Guidelines for National GHG Inventories (2014, 2006).

⁶ Source of the emission factor by country: Primary data and IEA (2023) CO₂ Emissions from Fuel Combustion.

The following table presents the results of the carbon footprint calculation broken down by type of activity (aquaculture, fishing, processing, and logistics) and country:

1 April 2023 - 31 March 2024			
Activity	Total GHG emissions [t CO ₂ e]	Production [t _{PROD}]	GHG Emissions Intensity [t CO ₂ e/t _{PROD}]
Aquaculture (from hatchery to cultivation output)			
Ecuador (shrimp farming)	59,602.8	26,735.8	2.23
Nicaragua (shrimp farming)	18,376.0	11,034.1	1.67
Guatemala (no aquaculture activity during the reporting period)	2,382.1	--	N/A
Spain (turbot farming)	2,723.2	3,570.9	0.76
Total for 'Aquaculture'	83,084.1	41,340.8	
Fishing (from capture to fishing output)			
Argentina (16 vessels)	27,503.9	15,486.0	1.78
Mozambique (26 vessels)	37,704.8	2,918.0	12.92
Namibia (9 vessels)	47,478.2	21,203.0	2.24
Total for 'Fishing'	112,686.9	39,607.0	
Industry (from inputs to plant gate)			
Argentina (1 industrial centre)	1,282.0	186.7	6.87
Ecuador (1 industrial centre)	15,123.8	45,427.5	0.33
Spain (5 industrial centres)	11,980.8	55,001.0	0.22
France (2 industrial centres)	2,477.9	12,368.1	0.20
Guatemala (1 industrial centre)	3,260.6	3,345.7	0.97
Namibia (2 industrial centres)	1,405.5	12,087.6	0.12
Nicaragua (1 industrial centre)	4,150.9	11,575.5	0.36
Peru (1 industrial centre)	527.0	8,312.8	0.06
Total for 'Industry'	40,208.5	148,304.9	
Logistics (transversal, corporate)			
Transport (air, land, sea)	23,536.0	--	--
Storage (cold storage rooms)	531.9	--	--
Business travel	739.1	--	--
Total for 'Logistics'	24,807.0	--	
Carbon Footprint	260,786.5	229,252.7	1.14

The reduction of GHG emissions is the result of the continuous effort to optimize the environmental performance of our extraction, production, and transformation operations.

The measures to reduce fuel consumption in the fishing fleet aim to reduce direct emissions and achieve a more efficient fishing activity through the optimization of the fish/fuel ratio. Key measures include the partial renewal of the fleet, which has significantly increased the efficiency of fishing operations; the reduction in the weight of trawl nets; the optimized design of trawl doors and drums; and the change to LED lighting on the vessels, all of which have reduced the power demand on engines and indirectly saved fuel.

With similar management principles, we have identified replacement, maintenance, and optimization programs for industrial equipment in the Group's plants that can increase their Performance Coefficient and generate significant energy consumption savings.

As mentioned earlier, a fundamental element of the *Environmental Compensation Programme* is quantifying the GHG emission compensation efforts through CO₂ capture and storage actions implemented within the Group's companies. Notable initiatives include those launched by Camanica (Nicaragua), Promarisco (Ecuador), and Novaguatemala (Guatemala), which have resulted in an estimated total of 19,256.5 tCO₂, representing 9.2% of the Group's Scope 1 and 2 emissions compensated by CO₂ capture projects in the current period.



To compensate for residual Scope 1 and 2 emissions gradually, with a target of achieving net-zero emissions by 2040, in combination with emission reduction efforts.

5. Biodiversity Protection

5.1 Conservation and Restoration of Biodiversity

The Group aims to ensure that its fishing activities are always guided by the principles of responsible management of biological resources and the maintenance of biodiversity and environmental quality necessary for the proper functioning of the ecosystem.

In this regard, as expressly stated in our *Code of Ethics*, the Group is committed to and adheres to the principles and standards set out in the *FAO Code of Conduct for Responsible Fisheries*, in addition to complying with and respecting international, national, regional, or local regulations governing maritime law and aquaculture activities in the countries where we operate.

The Group's principles for responsible fishing focus on combating illegal, unreported, and unregulated fishing; adopting selective and environmentally safe fishing gear and practices; preventing overfishing by complying with relevant management measures; minimizing waste during the capture, handling, processing, and distribution phases of fish and fish products; and collaborating with governments and non-governmental organizations in the conservation of fishery resources and the sustainable development of fisheries management.

Alongside fishing, the Group is committed to responsible aquaculture farming practices to positively contribute to the conservation and sustainable use of natural resources. This promotes optimal use while maintaining availability and quality for present and future

generations. Environmental management and sustainable development are achieved through the adoption of efficient and environmentally safe farming practices, avoiding overloading the absorption and regeneration capacity of natural ecosystems, complying with relevant management measures, and minimizing waste during the production, handling, processing, and distribution of aquaculture products.

Additionally, equivalent principles are adopted for industrial activities to minimize harmful ecological changes and the corresponding economic or social consequences stemming from these activities, their consumption, and specific emissions, including land use and occupation, while designing and implementing the necessary environmental and ecological mitigation and management plans.

Detailed information on biodiversity conservation initiatives under the *Environmental Compensation Programme* is available on our corporate website.

5.2 Potential Impacts on Protected Areas

The Group is committed to complying with all applicable national and international regulations related to environmental and socio-economic impact monitoring of our activities. Given the resource consumption nature of our operations, aquaculture and fishing activities in the various countries where the Group operates may have a potential impact on biodiversity. Therefore, these activities are governed by responsible management and operational plans, including, among others:

- Implementation of programmes for assessing, monitoring, and mitigating impacts of aquaculture activities.
- Conservation projects designed to mitigate or compensate for impacts and improve ecosystem health.
- In recent years, we have promoted conservation projects for iguanas and sea turtles, repopulating natural areas, mitigating risks for seabirds and shorebirds, as well as planting mangrove areas and native tree species.

Detailed information on potential environmental impacts and environmental protection initiatives under the *Transparency in Sustainability Programme* is available on our corporate website.

6. Other Aspects of Pollution

The emission of ozone-depleting substances (ODS) (GRI 305-6) consists exclusively of chlorodifluoromethane (HCFC-22 or R-22 refrigerant) and dichlorofluoroethane (solvent, cleaning agent for refrigeration systems HCFC-141b or R-141b). These emissions are reported in the following table for the year ending on 31 March 2024:

1 April 2023 – 31 March 2024	
Activity and Country	Emission of ODS [t CFC-11e]
Aquaculture	
Ecuador	-
Spain	-
Guatemala	-
Nicaragua	-
Fishing	
Argentina	0.07
Mozambique	0.41
Namibia	-
Processing	
Argentina	0.01
Ecuador	0.17
Spain	-
France	-
Guatemala	-
Namibia	-
Nicaragua	-
Peru	-
Total	0.66

(1.44 in 2022/23; -54%)

Source of Ozone Depletion Potentials (ODP): Montreal Protocol

We identify as preventive measures to minimize the emission of **Ozone-Depleting Substances** (ODS) the regular maintenance of refrigeration equipment for freezing or cooling chambers, both on ships and at transformation centres, as well as the necessary retrofitting of this equipment for the switch to refrigerants with lower, or no, ozone depletion potential (ODP).

Regarding fishing, aquaculture, and processing activities, we do not identify noise generation and light pollution as material environmental issues, as they are minimized through the adoption of the corresponding mitigating measures. Atmospheric emissions of nitrogen oxides (NOx), sulphur oxides (SOx), and other significant air emissions (GRI 305-7) are not considered material with respect to the Group's activities.

IV. INFORMATION ON SOCIAL ISSUES AND OUR PEOPLE

1. Employment

1.1 Employees

The total number and distribution of employees within the Nueva Pescanova Group by gender and country as of 31 March 2024 is as follows:

March 2024			
	Female	Male	Total
Argentina	54	673	727
Ecuador	466	1,540	2,006
USA	15	9	24
Spain	610	495	1,105
France	87	100	187
Greece	9	17	26
Guatemala	503	183	686
Ireland	13	16	29
Italy	8	7	15
Mozambique	24	602	626
Namibia	1,457	973	2,430
Nicaragua	284	997	1,281
Peru	89	84	173
Portugal	13	20	33
South Africa	2	3	5
Total	3,634	5,719	9,353

The total number and distribution of employees within the Group by age and country as of 31 March 2024 is as follows:

March 2024				
	<25	25-45	>45	Total
Argentina	27	352	348	727
Ecuador	359	1,192	455	2,006
USA	-	16	8	24
Spain	14	531	560	1,105
France	14	95	78	187
Greece	1	10	15	26
Guatemala	132	438	116	686
Ireland	3	8	18	29
Italy	-	11	4	15
Mozambique	11	367	248	626
Namibia	47	1,468	915	2,430
Nicaragua	170	894	217	1,281
Peru	24	113	36	173
Portugal	-	12	21	33
South Africa	-	4	1	5
Total	802	5,511	3,040	9,353

The total number and distribution of employees within the Group by professional classification and country as of 31 March 2024 is broken down in the following table:

Country	Senior management	Middle management	Specialist	Admin. & Blue-collar staff	Total
Argentina	2	86	53	586	727
Ecuador	1	198	371	1,436	2,006
USA	1	7	16	-	24
Spain	37	167	183	718	1,105
France	-	32	48	107	187
Greece	1	20	4	1	26
Guatemala	2	50	25	609	686
Ireland	1	6	2	20	29
Italy	1	7	-	7	15
Mozambique	1	53	30	542	626
Namibia	4	61	62	2,303	2,430
Nicaragua	1	64	321	895	1,281
Peru	2	16	32	123	173
Portugal	1	10	16	6	33
South Africa	1	2	1	1	5
Total	56	779	1,164	7,354	9,353

The data does not align with the data in the Consolidated Annual Accounts as the President is not included, since they do not have an employment contract with the Group.

1.2 Employment Contract Types

The total number and distribution of employment contract types within the Nueva Pescanova Group by country as of 31 March 2024 is represented below:

	March 2024		
	Full-time	Temporary	Total
Argentina	597	130	727
Ecuador	2,003	3	2,006
USA	24	-	24
Spain	1,069	36	1,105
France	174	13	187
Greece	25	1	26
Guatemala	659	27	686
Ireland	23	6	29
Italy	15	-	15
Mozambique	139	487	626
Namibia	1,131	1,299	2,430
Nicaragua	1,251	30	1,281
Peru	46	127	173
Portugal	33	-	33
South Africa	5	-	5
Total	7,194	2,159	9,353

The total number and distribution of employment contract types within the Group by gender, age, and professional classification as of 31 March 2024 is as follows:

Professional Category	Full-time						Temporary						Total
	Female			Male			Female			Male			
	<25	25-45	>45	<25	25-45	>45	<25	25-45	>45	<25	25-45	>45	
Senior management	-	7	5	-	11	33	-	-	-	-	-	-	56
Middle management	2	123	90	3	248	284	-	2	-	1	11	15	779
Specialist	14	208	86	62	498	228	2	9	1	2	26	28	1,164
Admin. & Blue-collar staff	140	1,056	933	442	1,728	993	62	785	109	72	799	235	7,354
Total	156	1,394	1,114	507	2,485	1,538	64	796	110	75	836	278	9,353

The average accumulated number of permanent and temporary contracts by gender, age, and professional classification for the fiscal year ending 31 March 2024 is presented in the following table:

Professional Category	Full-time						Temporary						Total
	Female			Male			Female			Male			
	<25	25-45	>45	<25	25-45	>45	<25	25-45	>45	<25	25-45	>45	
Senior management	-	5	6	-	12	35	-	-	-	-	-	-	58
Middle management	3	133	92	4	260	306	-	2	-	1	12	16	829
Specialist	20	232	99	74	553	230	4	12	1	3	29	25	1,282
Admin. & Blue-collar staff	201	1,176	941	533	1,863	1,004	212	1,060	142	301	943	207	8,583
Total	224	1,546	1,138	611	2,688	1,575	216	1,074	143	305	984	248	10,752

In Spain, the number of employees hired on a part-time basis stands at 124 as of 31 March 2024. In the collective agreements (or the labour frameworks established by local labour laws) in the other countries where the Group operates, there is no designation for part-time employees.

1.3 Dismissals

The number of dismissals by gender, age, and professional classification within the Group during the fiscal year ending 31 March 2024 is shown in the following table:

Professional Category	Female			Male		
	<25	25-45	>45	<25	25-45	>45
Senior management	-	-	-	-	1	7
Middle management	-	12	9	1	12	20
Specialist	1	13	9	2	18	15
Admin. & Blue-collar staff	23	69	26	23	66	12
Total	24	94	44	26	97	54

1.4 Average Remuneration of the Workforce

The average remunerations of the Group's professionals should be interpreted in the context of the geographic diversity in which we operate, considering the differences in GDP and purchasing power across the various countries.

Nevertheless, the average remunerations by country, age, and professional classification as of 31 March 2024 are as follows:

Argentina	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	57,016	89,155	-	45,307	62,967
Specialist	-	52,411	40,262	-	-	-
Admin. & Blue-collar staff	8,180	18,994	24,095	3,782	19,221	21,932

Ecuador	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	19,290	18,724	25,341	-	31,665	37,178
Specialist	8,117	9,069	9,502	9,194	11,031	10,211
Admin. & Blue-collar staff	6,342	6,479	6,519	6,387	6,560	6,548

Spain	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior management	-	96,165	133,876	-	77,804	102,430
Middle management	-	41,098	55,754	-	41,024	51,540
Specialist	20,500	31,210	47,766	-	31,531	44,088
Admin. & Blue-collar staff	17,080	20,072	25,291	14,464	18,492	22,724

France	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	67,266	67,178	-	56,199	62,520
Specialist	-	33,441	33,188	-	34,227	34,840
Admin. & Blue-collar staff	23,488	25,703	26,236	16,808	26,472	26,376

Greece	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	38,517	63,360	-	45,900	39,121
Specialist	-	-	-	-	28,853	-

Guatemala	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	17,421	18,411	10,891	9,666	29,831
Specialist	5,570	7,595	7,854	-	8,266	-
Admin. & Blue-collar staff	4,886	5,190	5,214	4,850	4,872	4,866

Ireland	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	-	69,927	-	-	47,708
Admin. & Blue-collar staff	26,416	30,272	26,411	-	22,199	27,000

Mozambique	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	20,035	32,269	-	23,880	-
Specialist	-	-	10,209	-	-	-
Admin. & Blue-collar staff	7,168	3,823	4,613	-	5,068	5,141

Namibia	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	48,496	80,041	-	34,440	-
Specialist	-	20,998	9,336	-	13,224	8,394
Admin. & Blue-collar staff	2,571	2,891	3,540	2,042	2,569	3,093

Nicaragua	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	11,579	37,950	-	12,464	26,639
Specialist	3,436	4,269	3,564	4,197	3,833	3,859
Admin. & Blue-collar staff	2,897	2,963	2,884	2,995	2,982	2,949

Peru	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	31,762	103,560	-	20,319	-
Specialist	-	7,613	-	8,552	9,918	7,055
Admin. & Blue-collar staff	3,868	4,568	4,339	3,957	3,959	4,038

Portugal	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	-	88,907	-	-	71,689
Specialist	-	27,806	30,629	-	23,839	-
Admin. & Blue-collar staff	-	-	23,462	-	-	22,038

For the calculation, gross annual salaries are considered. The categories of management and middle management are grouped together, except in Spain, due to data protection reasons, as there are not enough employees in the management category.

Additionally, the remunerations of the Group's companies in Italy, South Africa, and the USA are excluded due to the small number of employees in these locations.

The average remuneration for fleet professionals on fishing vessels of the Nueva Pescanova Group by age and professional classification is as follows:

Argentina	Male		
	<25	25-45	>45
Senior & middle management	-	111,766	58,372
Specialist	-	35,647	53,620
Admin. & Blue-collar staff	-	9,253	11,793

Mozambique	Male		
	<25	25-45	>45
Senior & middle management	-	50,370	40,064
Specialist	-	-	7,770
Admin. & Blue-collar staff	1,437	1,205	2,426

Namibia	Male		
	<25	25-45	>45
Senior & middle management	-	60,838	81,172
Specialist	-	21,012	11,792
Admin. & Blue-collar staff	-	5,219	7,467

The remuneration data for women employed on fishing vessels is excluded due to their very small number, making it statistically insignificant and therefore not comparable.

The average remunerations by country, age, and professional classification as of 31 March 2023 were as follows:

Argentina	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	4,204	41,402	116,381	-	39,100	64,482
Specialist	-	33,175	-	-	-	-
Admin. & Blue-collar staff	10,099	21,045	22,403	8,321	20,055	17,220

Ecuador	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	14,086	19,595	22,880	10,575	26,605	33,832
Specialist	8,200	8,865	9,470	12,828	10,752	13,541
Admin. & Blue-collar staff	6,153	6,299	6,341	6,020	6,322	6,386

Spain	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior management	-	102,963	148,558	-	104,594	86,623
Middle management	-	42,953	61,235	-	43,887	54,483
Specialist	22,946	33,443	49,212	12,884	30,417	44,212
Admin. & Blue-collar staff	16,541	19,714	24,945	14,183	17,957	22,491

France	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	64,003	66,919	-	51,137	61,590
Specialist	19,870	29,951	31,581	23,695	32,067	32,774
Admin. & Blue-collar staff	20,993	24,397	24,618	15,793	24,830	25,140

Greece	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	45,573	60,160	-	36,871	38,848
Specialist	-	24,109	-	-	27,773	21,094

Guatemala	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	6,269	15,732	18,023	10,132	11,366	25,992
Specialist	5,072	6,956	7,975	5,643	8,867	-
Admin. & Blue-collar staff	4,692	4,785	5,045	4,649	4,698	4,686

Ireland	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	37,728	67,782	-	-	47,708
Specialist	-	-	37,440	-	-	21,840
Admin. & Blue-collar staff	10,974	27,164	21,391	-	16,438	20,368

Mozambique	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	24,075	26,637	-	21,212	9,379
Specialist	-	7,311	5,803	-	1,715	-
Admin. & Blue-collar staff	1,789	3,076	3,112	2,816	3,925	4,452

Namibia	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	43,427	72,798	-	38,161	35,674
Specialist	-	17,353	13,502	-	16,832	8,116
Admin. & Blue-collar staff	2,112	2,868	3,240	2,486	2,634	3,147

Nicaragua	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	11,860	33,831	5,011	11,495	31,369
Specialist	3,149	3,684	3,326	3,074	3,908	3,654
Admin. & Blue-collar staff	2,757	2,753	2,739	2,860	2,857	2,767

Peru	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	24,036	98,090	-	19,582	-
Specialist	-	7,083	-	3,526	7,774	6,208
Admin. & Blue-collar staff	3,511	4,403	4,312	3,817	3,908	3,988

Portugal	Male			Female		
	<25	25-45	>45	<25	25-45	>45
Senior & middle management	-	57,750	95,467	-	-	66,439
Specialist	-	26,397	28,726	-	23,814	22,470
Admin. & Blue-collar staff	-	-	21,887	-	-	20,014

For the calculation, gross annual salaries are considered. The Management and Middle Management categories are grouped together, except in Spain, due to data protection reasons, as there are not enough employees in the management category to ensure privacy.

Additionally, the remuneration data from the Group's companies in Italy, South Africa, and the USA are excluded due to the small number of employees in these locations, making them statistically insignificant.

The average remuneration for fleet professionals on fishing vessels of the Nueva Pescanova Group by age and professional classification as of 31 March 2023 is as follows:

Argentina	Male		
	<25	25-45	>45
Senior & middle management	-	46,067	57,284
Specialist	-	40,318	47,849
Admin. & Blue-collar staff	-	10,193	12,237

Mozambique	Male		
	<25	25-45	>45
Senior & middle management	-	25,454	33,917
Specialist	-	21,911	6,228
Admin. & Blue-collar staff	2,669	1,015	2,248

Namibia	Male		
	<25	25-45	>45
Senior & middle management	-	67,781	76,815
Specialist	-	27,795	14,284
Admin. & Blue-collar staff	9,130	4,582	7,108

The remuneration data for women in fleet roles is excluded due to the non-comparability of salaries between women and men in these positions. As of 31 March 2023, the number of women employed on fishing vessels was 58, compared to 1,274 men (1,332 total employees).

1.5 Gender Pay Gap

The Group is committed to preventing any form of direct or indirect discrimination based on gender. To address this, it employs objective criteria and analytical systems to determine employee salaries, ensuring transparency and addressing any potential gender pay gap that may arise.

Data on the gender pay gap within the Group is presented as percentages in the following table. (a negative gap indicates that the average salary of women is higher than that of men, and vice versa):

Country	Pay gap 2023-2024	Pay gap 2022-2023
Argentina	16.7%	20.8%
Ecuador	(10.2%)	(7.8%)
Spain	7.3%	8.8%
France	2.2%	2.0%
Greece	31.4%	26.6%
Guatemala	3.6%	2.8%
Ireland	15.1%	18.0%
Mozambique	(15.9%)	(19.4%)
Namibia	13.8%	7.1%
Nicaragua	1.8%	(2.8%)
Peru	10.2%	15.0%
Portugal	15.9%	17.3%

The formula used to calculate the gender pay gap is:

(Average remuneration of men - Average remuneration of women) ÷ Average remuneration of men

The average remuneration for each country by gender is calculated by weighting the averages of professional categories by gender. For the calculation, gross annual salaries are considered, excluding the remuneration of fleet personnel due to the non-comparability of salaries between men and women in fleet roles. Additionally, remuneration data from the Group's companies in the USA, Italy, and South Africa are excluded due to the small number of employees in these locations.

1.6 Average Remuneration of Board Members and Senior Management

The remuneration of the members of the Board of Directors and the Senior Management of the Group is detailed in **Note 17.3** of the Consolidated Annual Accounts of Nueva Pescanova, S.L. and Dependent Companies for the fiscal year ending 31 March 2024. However, it is not broken down by gender due to data protection reasons.

The compensation received by Board members, whether for the functions performed, attendance at Board meetings, allowances, or statutory remuneration, is the same regardless of gender.

The Senior Management team comprises seven individuals, all of whom are men.

1.7 Right to Disconnect from Work

The Group's policies on the right to disconnect from work are outlined in the various collective agreements applicable in each country.

Additionally, Our Ethical Code and other regulations within our Internal Regulatory System explicitly govern the use of information and communication systems provided to employees for their work-related activities.

The Group states:

“Nueva Pescanova guarantees its employees the right to enjoy their rest time without work-related intrusions, as well as the prevention and limitation of the risk of technological overexposure among its workers. [...]

Therefore, Nueva Pescanova recognises all employees' right to digital disconnection outside of working hours. To support this right, Nueva Pescanova is committed to implementing measures that promote respect for all workers' rest time [...].”

1.8 Employees with Disabilities

As of 31 March 2024, the Group employs 74 individuals with disabilities.

2. Organisation of Work

2.1 Working Time

Working time is regulated by company-specific or sectoral collective agreements or by the labour laws applicable in each country where the Group operates. These regulations establish an annual maximum working time, set shifts, and other related provisions. The Group allows for irregular distribution of working hours based on organisational needs and regulates the performance of overtime hours in accordance with the maximum limits established by the labour laws of the countries where it operates.

Group employees are entitled to paid leave for various reasons, such as attending to and/or caring for family members, under the provisions for paid leave.

Regarding remote work, the Group has implemented the **Corporate Remote Work Policy** and the corresponding **General Procedure for Managing Remote Work at Nueva Pescanova Group**, which aim to formally establish the criteria and requirements for employees to benefit from remote working arrangements.

These policies provide employees with a work mode that allows them to carry out their duties outside their usual workplace, tailored to their personal needs, thus promoting a balance between personal and professional life.

2.2 Absenteeism

The total number of hours lost due to common illness among Group companies in Spain was 153,345 hours, and 262,817 hours in other countries during the fiscal year ending 31 March 2024 (compared to 468,007 hours for the entire Group in the fiscal year ending 31 March 2023). Data from Greece, Italy, Portugal, South Africa, and the USA were not included as they are not significant within the Group's context.

2.3 Work-Life Balance and Shared Parental Responsibility

Group employees can adjust the duration and distribution of their working hours to exercise their right to balance personal, family, and professional life, within the possibilities available to the Group at any given time. This adjustment must respect the total weekly/annual working hours as applicable, in accordance with the terms and scope provided in collective agreements or applicable labour laws.

Additionally, collective agreements or applicable labour laws regulate certain paid leaves, such as nursing leave, reduced working hours to care for minors or individuals with disabilities, and extended leave to address personal or family circumstances. Finally, the *Corporate Responsible People Management Policy* formally outlines the Group's commitments to its employees in terms of labour responsibility, including "an appropriate balance between their family and professional lives."

Through equality plans such as the *First Equality Plan of Pescanova España S.L.U.*, valid until 2025, the Group promotes measures to ensure the exercise of rights related to work-life balance and facilitate the integration of personal, family, and professional life.

3. Health and Safety

3.1 Workplace Health and Safety Conditions

The Nueva Pescanova Group has a *Corporate Occupational Health and Safety Policy* that applies to the entire Group. This policy includes a commitment to the strict compliance with occupational health and safety obligations, as established by national and international regulations. This commitment is further reinforced by our *Corporate Responsible People Management Policy*.

Each country, through its Country Manager, is responsible for the integration of the *Occupational Risk Prevention System*, strictly adhering to the legal requirements of the countries where the Group operates.

In general, the Group implements a series of *Operational Work Procedures*, including Risk assessment, Preventive planning, Ergonomic and hygiene studies, Emergency and/or self-protection measures, Health monitoring measures, Safety inspections, Investigations of accidents and occupational diseases, Meetings of safety and health committees (or equivalent, depending on the country), Analysis of accident costs, and others. Each country is required to specifically implement these procedures based on its respective legal framework.

3.2 Workplace Accidents and Occupational Diseases

3.2.1 Workplace Accidents and rates

The table below shows the number of workplace accidents by gender, along with the corresponding incident indicators for the Group's in-house staff during the fiscal year ending 31 March 2024:

	Female	Male	Total
Number of Workplace Accidents	63	186	249
Incidence rate	15.84	30.58	24.75
Frequency rate	8.17	3.77	4.36
Severity rate	0.23	0.10	0.12

Worked hours are the theoretical working hours in the collective bargaining agreements.

Data in relative numbers, whose calculation basis is as follows:

Incidence rate: number of accidents per 1,000 workers (n° of accidents/ n° workers \times 1,000).

Frequency rate: number of accidents per 1,000,000 hours worked (n° of accidents/hours worked \times 1,000,000).

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

3.2.2 Occupational Diseases

During the fiscal year ending 31 March 2024, there were seven cases of occupational diseases reported within the Group. This refers to countries where the current legislation recognises the existence of occupational diseases.

4. Social Relations

4.1 Social Dialogue and Promotion of Employee Involvement in Management

Regular meetings are held with the representatives of employees at various work centres (Works Councils, Staff Delegates, or equivalent legal employee representatives in each location) in the countries where the Group operates. These meetings address matters related to the activities and management of the respective work centres.

4.2 Collective Bargaining Agreements

The percentage of Group employees covered by either a company-specific or sectoral collective agreement, by country, as of 31 March 2024, is shown in the following table:

Country	Employees [%]
Argentina	83
Spain	98
France	100
Greece	100
Italy	100
Mozambique	100
Namibia	90
Portugal	100

In the other countries where the Nueva Pescanova Group operates and which are not reflected in the previous table, our employees are covered by the framework of labour relations established under local labour laws.

5. Talent Development and Management

In the Group, talent management takes a holistic approach, where all processes are interdependent. This allows us to standardise the policies for selection, training, and development, aiming for excellence in all processes, with the goal of contributing to value creation for the Group and the individuals who make it up.

The Group's Human Resources Directorate has implemented innovative talent management strategies, aligned with current and future business challenges, to facilitate the development and satisfaction of the people within the organisation.

The corporate documents establishing the Group's talent management include our *Corporate Talent Management Policy*, our *General Talent Management Procedure*, and our *Corporate Responsible People Management Policy*.

5.1 Training and Learning

The Group provides employees with an annual *Training Plan*, tailored to existing training needs, contributing to the development and growth of the professionals who are part of the organisation.

Training needs are identified annually, defining the areas that need to be addressed in the following year. Any mandatory training should be included within the defined training needs.

The following table shows the total number of training hours received by the Group's professionals, broken down by categories, during the fiscal year ending 31 March 2024:

Professional Category	Training hours
Senior Management	796
Middle Management	15,163
Specialist	15,986
Admin. & Blue-collar staff	28,277
Total	60,222

The total number of professionals who received training during the fiscal year ending 31 March 2024 is **6,826 individuals**, resulting in an average of 8.82 hours of training per professional.

5.2 Internal Promotion

The Group has implemented an internal promotion process based on professional merit, performance objectives, and the competencies of the professionals within the Group.

5.3 Performance Evaluation

The Group has an annual performance evaluation process based on two fundamental criteria: the degree of achievement of previously established performance objectives and the competencies assigned to each role.

In this regard, during the period covered by this report, the *Compass Project* was successfully implemented at the international level. Thanks to this project, all the Group's subsidiaries execute the annual evaluation process using the same corporate personnel management tool (*Workday*).

5.4 Succession

The Group has established a succession process within the organisation, aimed at training and preparing the best possible talent to occupy key positions essential for the Group's continuity, retention, sustainability, and overall success.

6. Equality

6.1 Promotion of Equal Treatment and Opportunity between Women and Men

Both *Our Ethical Code* and our *Supplier Ethical and Social Charter* explicitly include the principles of non-discrimination and equal opportunity between women and men.

Similarly, our *Corporate Talent Management Policy* is based on establishing equal opportunity and treatment, regardless of gender, race, religion, disability, marital status, sexual orientation, family situation, age, or any other condition. Our *Corporate Recruitment, Selection, Onboarding, and Exit Policy* also includes non-discrimination and equality of opportunity as core values and

principles. Additionally, our *Corporate Responsible People Management Policy* reinforces the Group's commitment to respecting and promoting equality.

Furthermore, our *Corporate Criminal Risk Prevention Policy* affirms the Group's commitment to rejecting any form of workplace discrimination in all the countries where we operate.

Additionally, the collective bargaining agreements and labour regulations in the countries where the Group operates establish the general principle of promoting equality between men and women, commitment to equality of treatment and opportunities in the workplace, as well as measures aimed at preventing any type of discrimination between genders.

An initiative called *Women in Pescanova (WIP)* has been launched by a group of women professionals within the Group. The objectives of WIP include:

- Giving visibility to women within the organisation.
- Generating forums for debate and improvement and serving as a think tank on certain issues for the company.
- Promoting inclusive practices in selection, training, promotion, and remuneration processes, without undermining the principles of merit and capability.
- Creating a coalition to identify and support female talent.
- Making proposals that promote integration and equality.
- Generating external role models in diverse positions and sectors.

6.2 Equality Plans

The Group's companies and the legal representatives of workers strongly commit to promoting equality between men and women, equality of treatment and opportunities in the workplace, as well as implementing measures to avoid any form of workplace discrimination between genders.

To this end, the *Joint Equality Commission*, the *Legal Representation of Workers*, and the *Company Management* have developed plans aimed at integrating gender perspective into various areas, including actions in: selection, recruitment, job classification, training, professional promotion, remuneration, work-life balance and shared responsibility, underrepresentation, harassment (labour, sexual, gender-based, and/or discriminatory), gender violence, corporate culture, communication and awareness, occupational health and safety, and labour health.

6.3 Prevention of Sexual and Gender-Based Harassment

Our *Ethical Code* and our *Corporate Criminal Risk Prevention Policy* reject any form of violence, harassment (labour, physical, sexual, psychological, moral), or any other behaviour that creates a hostile or offensive work environment against the personal rights of employees.

Similarly, our *Supplier Ethical and Social Charter* prohibits suppliers of the Group from permitting any form of harassment, abuse of authority, or intimidation, degrading or offensive treatment of their employees and collaborators.

6.4 Universal Accessibility for People with Disabilities

The Group, through service contracts, supply agreements, or donations, collaborates with various associations that support social initiatives, including those aimed at the social integration of people with disabilities.

V. INFORMATION ON RESPECT FOR HUMAN RIGHTS, CORRUPTION, AND BRIBERY

1. Introduction

As stated in *Our Ethical Code*, the Group is committed to and bound by the human and labour rights recognised in both national and international legislation, as well as the principles underpinning the United Nations Global Compact.

In this regard, the Group is a member of the *United Nations Global Compact* and the *Spanish Network of the Global Compact*.

The Group has established the *Corporate Human Rights Policy of the Nueva Pescanova Group*, which aims to define and develop our commitment to respecting human rights, both in the development of our internal value chain activities and in our external supply chains.

In addition to the aforementioned policies, there are numerous regulatory documents within our *Corporate Governance and Compliance System* that outline the principles of action and codes of conduct related to respecting internationally recognised human and labour rights. This is particularly relevant in terms of the *freedom of association*, the *right to collective bargaining*, the *elimination of discrimination in employment and occupation*, the *eradication of any form of forced or compulsory labour*, and the *effective abolition of child labour*. Furthermore, these documents include corporate measures aimed at preventing all forms of corruption, bribery, and money laundering.

2. Due Diligence and Prevention Procedures

2.1 Training and Awareness

The Compliance Unit Director conducts compliance training sessions for certain new members of the Group (generally individuals in managerial positions). These training sessions include various modules focused on issues related to respect for human rights, the prevention of corruption and money laundering as outlined in *Our Ethical Code*, the *Supplier Ethical and Social Charter*, the *Corporate Policy on the Prevention of Criminal Risks*, and *Our Anti-Corruption Code*.

Additionally, through the Group's e-Learning platform ("Nueva Pescanova Campus"), there is a specific section called the "Nueva Pescanova Group Compliance Academy," which hosts various compliance courses available to Group professionals.

2.2 Annual Responsible Declarations on Compliance and Contacts with Authorities and Public Officials

Annually, members of the Board of Directors and certain professionals within the Group sign a *Responsible Declaration on Compliance*, in which they commit to specific and express obligations regarding the respect for human and labour rights, the prevention of corruption, money laundering, and the prevention of terrorism.

2.3 Document of Receipt and Acceptance of the Decalogue of Our Ethical Code

Every new member joining the Group signs a document called the "Document of Receipt and Acceptance of the Decalogue of Our Ethical Code" at the time of their recruitment. This Decalogue explicitly includes various conduct norms related to "Human and Labour Rights," "Integrity," "Transparency," and "Honesty."

2.4 Responsible Declaration of the Supplier Ethical and Social Charter

All suppliers to the Group must sign the *Responsible Declaration* contained in the annex of our *Supplier Ethical and Social Charter*.

Through this responsible declaration, the supplier expressly agrees to our *Supplier Ethical and Social Charter* and confirms, among other things, that neither the individual signing it, nor the company they represent, nor their directors or legal representatives, have been convicted by a final judgment of crimes such as human trafficking, prostitution, sexual exploitation, and corruption of minors, illegal trafficking of labour, fraudulent immigration, or promotion or incitement to hate, hostility, discrimination, or violence against individuals, public or private corruption, money laundering, or terrorism financing.

2.5 Compliance Channel

The Group's Compliance Channel is the communication mechanism through which any individual, whether part of the Group or not, from anywhere in the world, can transparently and confidentially (including anonymously) raise questions or report compliance-related issues to the Compliance Unit, with all guarantees and without fear of retaliation.

The terms of use, operating rules, guiding principles, and procedural rules for the compliance channel are regulated in the *Compliance Channel Regulations* and the *WhistleB® Privacy Policy* of the Nueva Pescanova Group.

During the fiscal year ending 31 March 2024, none of the cases handled by the Compliance Unit regarding inquiries and complaints involved potential human rights violations.

2.6 Supplier Ethical Channel

In accordance with the provisions of our *Ethical and Social Charter for Suppliers*, the Group's suppliers can make inquiries and submit complaints regarding violations of the Charter by a

Group professional or another Supplier through the Supplier Ethical Channel. During the fiscal year ending 31 March 2024, no complaints were made through the Supplier Ethical Channel regarding potential human rights violations, irregular conduct related to corruption prevention, bribery, money laundering, or terrorism financing.

Furthermore, the Group rejects any form or type of corruption and maintains a zero-tolerance policy towards any corrupt behaviour, conduct, or practices in both the public and private sectors.

Additionally, certain professionals within the Group are required to periodically submit a "*Declaration of Contacts with Authorities and Public Officials*" to the Compliance Unit Director. This declaration must state whether the obligated individuals have had any contact with Authorities or Public Officials.

3. Contributions to Associations, Foundations, and Non-Profit Entities

During the fiscal year ending 31 March 2024, the Group made contributions to associations, foundations, and non-profit entities amounting to €223,762.91.

VI. INFORMATION ON SOCIETY AND OTHER STAKEHOLDERS

1. Introduction

The *Corporate Policy on Institutional Relations* provides a detailed identification and definition of our *key stakeholders*, and the communication channels established with them. The following groups are specifically identified as stakeholders: Public Administrations, Regulatory and Supervisory Bodies, Partners, Academia and Research Institutions, Non-Governmental Organisations, Employees, Suppliers, Customers, Consumers, Competitors, the Environment, the Media, Associations, Local Communities, and Society in general.

2. Sustainable Development

2.1 Employment and Local Development

The personal and professional development of the *People* within the Group, as well as the improvement of quality of life in the *Communities* where the Group operates, are central elements of our strategy and the *Corporate Social Responsibility* (CSR) Master Plan.

Key measures implemented by the Group to promote employment include:

- Participation in job fairs and other events.
- Collaboration with ICEX Vives to promote youth employment by offering non-labour internships in various subsidiaries of the Group.
- Hiring interns to facilitate the integration of young people into the workforce.

- Collaboration with vocational training centres for Dual Vocational Education and the incorporation of students from diverse training programmes.
- Visits to local communities with little or no economic activity in various countries to establish contact with residents, introduce them to the Group, and attract or develop local talent.
- Programmes in different Group subsidiaries aimed at enhancing professional skills related to the maritime-fishing or aquaculture sectors.

The Group's fishing presence in Africa and Latin America, as well as its aquaculture operations in Latin America, promotes job creation and local development. These initiatives provide training in skills related to fishing, aquaculture cultivation, and product processing, fostering local economic growth.

The Group generates 84.8% of its employment in Africa and Latin America, where it develops projects aligned with the material aspects relevant to the Group. The "**Communities**" pillar of the **CSR Master Plan** promotes job creation through knowledge and technology transfer, leading social development projects and investing in assets and infrastructure to improve living conditions in local communities where the Group operates.

The following table presents the regional breakdown of employment creation by the Group for the fiscal year ending 31 March 2024:

Geographic area	Female	Male	Total
Africa	1,483	1,578	3,061
Central & South America	1,396	3,477	4,873
Europe & USA	755	664	1,419
Total	3,634	5,719	9,353

2.2 Local Populations and Territories

In Ecuador and Nicaragua, the Group implements environmental management and biodiversity conservation programmes, including the reforestation of mangroves and other native plant species and the repopulation of local fauna. These projects also contribute to the preservation of Estero Real in Chinandega, a significant natural reserve in Nicaragua.

Additionally, the Group has developed knowledge-transfer programmes focused on fishing-related trades, among others, in Namibia and Mozambique, alongside educational initiatives.

The Group continues its educational efforts through the Fundanova Foundation and the Experimental Pacific School (CEPAC, Colegio Experimental del Pacífico) in the Guatemalan town of Champerico, catering to students at various educational levels. It is also involved in Ministry of Education programmes distributing food to the families of all students.

The Group has supported societal initiatives in the countries where it operates, making cumulative donations of €472,393 during the fiscal year ending 31 March 2024.

Of the total donations, €321,165 (68% of the total) corresponds to 68,769 kg of donated food. The remainder includes monetary contributions (€126,435) and other goods (€24,793).

The distribution of the donated value by company is shown in the following table:

Company name	Value (€)
Argenova	21,480
Camánica	9,406
Eiranova	700
Nova Pesqueira Lobito	863
Novaguatemala	1,694
Novanam	101,572
Novaperu	15,585
Pescamar	4,047
Promarisco	14,165
Pescanova España	187,980
Pescanova Italia	3,203
Pescanova Hellas	1,085
Pescanova Portugal	42,570
Pescanova USA	66,385
Nueva Pescanova France	1,658
Total	472,393

2.3 Local Communities and Communication Channels

The relationships between the Nueva Pescanova Group and its stakeholders are built on collaboration, cooperation, engagement, and two-way communication, fostering continuous trust based on ethical principles, equal treatment, transparency, and active listening. Among the identified stakeholders, "local communities" stand out. These are defined as groups of people who share the same culture in a specific location or period and interact with the companies of the Nueva Pescanova Group.

The Nueva Pescanova Group has established communication channels with these stakeholders to actively listen to their needs and expectations and to share information about the activities of the various companies in the Group in an ethical and effective manner.

2.4 Associations and Sponsorship

The Group participates in local, regional, and national associations that contribute to social, economic, and environmental development, creating permanent channels of dialogue with stakeholders in each country.

Outlined below are some of the associations in which the Group's companies are institutionally involved, categorised by area:

- i. **Fishing:** ARVI (Cooperative of Shipowners of the Port of Vigo); CEPESCA (Spanish Fisheries Confederation); AMAPIC (Mozambican Association of Industrial Shrimp Trawlers); CAPA (Chamber of Squid Jiggers of Argentina); CAPECA (Chamber of Argentine Freezer Trawlers); NHA (Namibian Hake Association); NFI (National Fisheries Institute); ANASCO (National Association of Shipowners); COLTO (Coalition of Legal Toothfish Operators), among others.
- ii. **Aquaculture:** APROMAR (Spanish Aquaculture Business Association); CETGA (Galician Aquaculture Cluster); ANDA (Nicaraguan Association of Aquaculture Farmers); among others.
- iii. **Processing:** ASEFAPRE (Spanish Association of Prepared Meal Manufacturers); ANFACO-CECOPECA (National Association of Canned Fish and Seafood Manufacturers - Technical Conservation Centre for Fishing Products, Spain), among others.
- iv. **Trade:** AECOC (Spanish Association for Commercial Coding); CONXEMAR (Spanish Association of Seafood Wholesalers, Importers, Exporters, and Processors); GS1 Portugal - CODIPOR (Portuguese Association for Product Identification and Coding); CENTROMARCA (Portuguese Association of Brand Product Companies), among others.
- v. **Sustainability:** SSP (Sustainable Shrimp Partnership); FISH (Fairness, Integrity, Safety, and Health) Standard for Crew; Alianza Galega polo Clima (Galician Climate Alliance); ECOEMBES (Eco-packaging Spain, S.A.), among others.
- vi. **Traceability:** GDST (Global Dialogue on Seafood Traceability).
- vii. **R&D and Quality:** AEC (Spanish Association for Quality).
- viii. **Advertising and Communication:** AUTOCONTROL (Independent Advertising Self-Regulation Organisation in Spain), among others.
- ix. **Governance:** UN Global Compact (Spanish Network); GSSI (Global Sustainable Seafood Initiative), among others.

3. Subcontracting and Suppliers

3.1 Social, Gender Equality, Environmental, and Corporate Responsibility Issues

In accordance with our *Corporate Purchasing Policy*, the approval and/or selection of suppliers considers the candidates' ethical commitment, institutional integrity, sustainability, and strong corporate reputation. Candidates are positively evaluated if they have an ethical code or a similar document related to conduct and good business practices. Additionally, care is taken to ensure that candidates being approved or selected are not, and have not been, involved in activities or practices contrary to the principles outlined in *Our Ethical Code*.

Similarly, the *General Procurement Procedure for Goods and Services of the Nueva Pescanova Group (the Procurement Procedure)* establishes that framework, commission, and intermediation

contracts, as well as general purchasing agreements subject to its scope, must include the requirements and stipulations set by the Group at any given time. These may relate to non-financial information areas such as sustainability, social responsibility, and others.

Moreover, by signing the Group's *Ethical and Social Charter for Suppliers* and the accompanying *Responsible Declaration*, our suppliers commit to a series of obligations concerning social, gender equality, environmental, social responsibility, and other related matters.

3.2 Supervision and Audits of Suppliers

By signing, accepting, and agreeing to the Group's *Ethical and Social Charter for Suppliers*, the Group's suppliers consent to verification activities to ensure compliance. Suppliers authorise the Group or third parties designated by it to carry out the necessary checks, granting access to their facilities, relevant resources, and documentation required to confirm compliance with the terms of the Charter.

Any breach of the *Ethical and Social Charter* by a supplier may, depending on its severity and associated circumstances, lead to the immediate and early termination of their contractual relationship with the Group, without prejudice to other actions the Group may take to protect its legitimate interests.

During the fiscal year ending 31 March 2024, no instances of non-compliance with the *Ethical and Social Charter for Suppliers* were reported by any of the suppliers who had signed the Charter worldwide.

4. Consumers

As previously mentioned, the Group has its own code of conduct and good business practices (*Our Ethical Code*) that establishes a set of principles and behavioural guidelines aimed at ensuring the ethical, integral, and responsible conduct of all its professionals. In terms of Quality and Food Safety, the following commitments are outlined in *Our Ethical Code*:

- **Quality and Excellence:** The quality and excellence of the products offered by the Group is one of its essential and strategic objectives. In this regard, the Group is committed to offering products of the highest food quality, strictly adhering to food safety and preservation regulations and carrying out exhaustive controls in all processes to ensure food safety and health.
- **Legislative Compliance:** The Group is dedicated to marketing products that comply with the guarantees established by legislation concerning quality, composition, and expiry. It sources from suppliers who are certified in the required quality and food safety standards. Furthermore, the Group always maintains precise internal procedures to detect risks that could pose a threat to human health and implements all necessary measures to resolve any incidents. In this regard, the Group has established the necessary policies and guidelines to provide its customers and consumers with quality products.

Our products adhere to the strictest standards of food safety and quality. They are healthy, nutritious, and enjoyable, and production processes are carried out using the best available techniques, based on efficiency and sustainability.

4.1 **Measures for Consumer Health and Safety**

In particular, the Group's *Corporate Quality and Food Safety Policy* is aligned with our *Corporate CSR Policy* and, more specifically, with the commitments made under the "*Products*" pillar of our *CSR Strategy*. One of these commitments is to offer consumers innovative and healthy seafood products while researching and communicating the importance of the nutritional value of these products in their diets. The most notable projects undertaken by the Group in the current fiscal year relating to nutrition and packaging sustainability include:

- **Melipop Project:** Prevention of childhood obesity through the adoption of a Mediterranean lifestyle.
- **Medkids Project:** Development of new fish-based products aimed at improving dietary habits among children to prevent obesity.
- **Anisakischeck Project:** Creation of a system for the automatic detection of anisakis in frozen fish during industrial processing.
- **Life-Refish Project:** Establishment of a demonstration biorefinery to add value to underutilised fish and seafood by-products, transforming them into high-value-added products.
- **INNOAQUA Project:** Development of innovative food products based on algae from multi-trophic aquaculture.
- **Pezconocidos Project:** A collaboration between Ángel León, the Nueva Pescanova Group, and Compass Group to maximise fishing efficiency through the development of new products from underutilised fish species.

- **Continuous Nutritional Composition Improvement Project:** Review of Pescanova product nutritional profiles to make them the healthiest option, increasing beneficial nutrients such as fibre, vitamins, minerals, or protein, while reducing others such as salt and saturated fats.
- **Sustainable and Recyclable Packaging Project:** Evaluation of packaging recyclability using the internal PACKSCORE method, aiming to increase the use of sustainable, recyclable, or recycled plastic materials in all Group packaging.

The Corporate Directorate of Quality, Food Safety, and Environment ensures the ongoing operation of our Food Safety, Quality, and Environment System (**SACMA**), which is responsible for setting guidelines and monitoring compliance. SACMA revolves around two key systems:

- **Legal Compliance (Food Compliance and Environmental Compliance):** Tools provide customised and updated services regarding hygiene, food safety, environmental, and industrial safety regulations.
- **Hazard Analysis and Critical Control Points (HACCP):** A system to monitor and analyse hazards and critical points of possible food contamination from microbial, physical, or chemical agents. Our HACCP subsystem implementation follows the seven core principles established by the *Codex Alimentarius*.

Another key element of SACMA is our Food Technical Standards (NTAs), which establish specific requirements for the Group's companies in food safety, quality, and environmental matters, and are mandatory within the Group. As of 31 March 2024, the number of approved and active NTAs stands at 96, alongside three manuals and five procedures.

The Corporate Directorate of Quality, Food Safety, and Environment has developed a management and improvement tool integrated within the **SACMA** system, granting authorised users across the Group access to resources and services related to quality, food safety, and the environment.

With access to relevant documentation (NTAs, manuals, legislation, and reference links), complaint management applications, action management tools, and records provided by Group companies, deviations or significant non-conformities reported by **SACMA** managers can be monitored in real-time. This enables quicker decision-making, which benefits consumer safety and health.

Additionally, around raw material supplier approval, as well as in food safety, quality, and environmental matters, **75 audits** of raw material suppliers were conducted during the fiscal year using a mixed model of on-site and remote audits. Of these, 73 were graded as “approved,” and 2 as “conditionally approved.”

4.2 Complaints, Grievances, and Resolutions

Consumers and customers are at the heart of our activities; therefore, the Group has a **Claims Management Manual (M-02)** under **SACMA** reference), aimed at defining the general processes for receiving and managing claims submitted by customers and consumers. This manual is based on the following flow and diagram:

CLIENT
INCIDENCES



The *process for managing, consulting, and monitoring received claims* is carried out through an application accessible via our *SACMA portal*.

The Corporate Directorate of Quality, Food Safety, and Environment individually monitors the management of received claims to oversee the actions taken or request the initiation of corrective or preventive measures if deemed necessary. Specifically, *SACMA* includes a Manual for Managing Corrective and Preventive Actions.

In this context, a monthly review is conducted to examine claims received over the past 12 months, categorised by origin or cause. Where the severity or recurrence of an issue warrants, broader corrective actions or improvement projects are initiated to ensure these issues are eliminated.

Additionally, as a further quality indicator, claims are monitored monthly by analysing: **(i)** the number of claims received over the last 12 months compared to the same period in the previous year; **(ii)** details of claims from the most recent month; **(iii)** the number of claims categorised by origin over the past 12 months; and **(iv)** the number of claims relative to the tonnes produced.

During the fiscal year ending 31 March 2024, **508 claims** were received via the *SeSuite portal*, of which 259 were from consumers and 249 from customers. These were primarily related to organoleptic characteristics, packaging, defective products, or the presence of foreign objects in products. As of the date of this report, 64% of these claims have been resolved.

5. Fiscal Information

5.1 Results Achieved

The Group reported pre-tax results (before consolidation adjustments) by Cash Generating Unit (CGU)⁷ for the fiscal year ending 31 March 2024, as follows:

CGU	March 2024
Aquaculture – Vannamei	(93,502,436)
Commercial & other	(39,016,377)
Fishing – África	(4,413,466)
Fishing – Southern Cone	(4,400,871)
Total	(141,333,150)

5.2 Taxes

The Group paid a total of €1,700,037 in corporate taxes during the fiscal year, based on cash criteria.

5.3 Public Subsidies

Spanish and international subsidiaries of the Group received public subsidies amounting to €2,267,663 during the fiscal year.

⁷ The countries included in each of the CGUs are as follows: **UGE Vannamei Aquaculture** (Ecuador, Guatemala, and Nicaragua); **UGE Trade and Others** (Spain, France, Italy, Ireland, Greece, Portugal, South Africa, and the USA); **UGE Fishing Africa** (Namibia and Mozambique); and **UGE Fishing Southern Cone** (Argentina and Peru).

VII. ANNEX I. INDEX OF CONTENTS REQUIRED BY LAW 11/2018, OF 28 DECEMBER

In accordance with the provisions of Law 11/2018, of 28 December, on Non-Financial and Diversity Information, the following table provides an equivalence between the topics to be covered in the Non-Financial Information Statement as required by Law 11/2018, of 28 December, and the corresponding general and thematic standards selected from the *Global Reporting Initiative* (GRI). These standards have been used as a reference to report the relevant information on these material aspects, also indicating the page number in this Report where such information can be found:

Index of Contents Required by Law 11/2018			
Information Required by Law 11/2018	Materiality	Page of the report where the information is provided	Selected GRI Reporting Criteria <i>(Latest version unless otherwise specified)</i>
GENERAL INFORMATION			
A brief description of the business model, including its business environment, organization, and structure.	Material	5-9	GRI 2-6
Markets in which it operates.	Material	5-6	GRI 2-1 GRI 2-6
Objectives and strategies of the organization.	Material	6-8, 12-16	GRI 2-1
Key factors and trends that may affect its future evolution.	Material	8	GRI 3-3
Reporting framework used.	Material	5	GRI 1
ENVIRONMENTAL ISSUES			
Management Approach: Description and results of the policies related to these issues, as well as the main risks associated with these issues linked to the Group's activities.	Material	10-22	GRI 3-3
Detailed General Information			
Detailed Information on the Current and Predictable Effects of the Company's Activities on the Environment and, where applicable, Health and Safety	Material	21-22	GRI 3-3
Environmental assessment or certification procedures.	Material	22	GRI 3-3
Resources dedicated to environmental risk prevention.	Material	22	GRI 3-3
Application of the precautionary principle.	Material	21-22	GRI 2-23
Number of provisions and guarantees for environmental risks.	Material	22	GRI 3-3
Pollution			
Measures to Prevent, Reduce, or Remediate Emissions that Severely Affect the Environment, including any form of activity-specific air pollution, such as noise and light pollution.	Material	28-29, 34	GRI 3-3

Index of Contents Required by Law 11/2018			
Information Required by Law 11/2018	Materiality	Page of the report where the information is provided	Selected GRI Reporting Criteria <i>(Latest version unless otherwise specified)</i>
Circular Economy and Waste Prevention and Management			
Measures for Prevention, Recycling, Reuse, Other Forms of Recovery, and Waste Disposal	Material	26-28	GRI 3-3 GRI 306-1 GRI 306-2 GRI 306-3 GRI 306-4 and 306-5, regarding the weight of hazardous and non-hazardous waste.
Actions to Combat Food Waste.	Material	28	GRI 3-3
Sustainable Use of Resources			
Water Consumption and Water Supply in Accordance with Local Limitations	Material	22-23	GRI 303-3 regarding the source of water consumed. GRI 303-5
Consumption of raw materials and measures adopted to improve the efficiency of their use.	Material	24	GRI 301-1 regarding the efficiency of raw material consumption.
Direct and indirect energy consumption.	Material	24-26	GRI 302-1 GRI 302-3
Measures taken to improve energy efficiency.	Material	24-26	GRI 3-3
Use of renewable energy.	Material	24-26	GRI 302-1
Climate Change			
Greenhouse Gas Emissions Generated as a Result of the Company's Activities, Including the Use of the Goods and Services It Produces	Material	29-31, 34	GRI 305-1 GRI 305-2 GRI 305-3 GRI 305-4
Measures adopted to adapt to the consequences of climate change.	Material	28-29, 32	GRI 3-3
Voluntary medium- and long-term reduction targets set to reduce greenhouse gas emissions, and the means implemented to achieve them.	Material	28-29	GRI 3-3
Biodiversity Protection			
Measures Taken to Preserve or Restore Biodiversity	Material	32-33	GRI 3-3 GRI 304-3 regarding measures taken to preserve biodiversity
Impacts caused by activities or operations in protected areas.	Material	33	GRI 3-3 GRI 304-2

Index of Contents Required by Law 11/2018			
Information Required by Law 11/2018	Materiality	Page of the report where the information is provided	Selected GRI Reporting Criteria <i>(Latest version unless otherwise specified)</i>
SOCIAL ISSUES AND EMPLOYEE-RELATED MATTERS			
Management Approach: Description and results of the policies related to these issues, as well as the main risks associated with these issues linked to the Group's activities.	Material	10-21, 45-48	GRI 3-3
Employment			
Total number and distribution of employees by country, gender, age, and professional classification.	Material	35-36	GRI 405-1 regarding the distribution of employees by country, gender, age, and professional classification.
Total number and distribution of employment contract types and the annual average of permanent, temporary, and part-time contracts by gender, age, and professional classification.	Material	37-38	GRI 2-7 regarding the total number of employees by employment contract type and work contract, broken down by gender, age, and professional classification.
Number of dismissals by gender, age, and professional classification.	Material	38	GRI 3-3
Average remuneration and its evolution, broken down by gender, age, and professional classification or equal value.	Material	38-44	GRI 3-3 GRI 405-2 regarding average remuneration by gender, age, and professional classification.
Salary gap, remuneration for equal or comparable jobs within the company.	Material	44	GRI 3-3 GRI 405-2 regarding average remuneration of women compared to men, broken down by professional classification and location with significant operations.
Average remuneration for directors and executives, including variable pay, allowances, severance, contributions to long-term savings schemes, and any other compensation, broken down by gender.	Material	45	GRI 3-3
Implementation of work disconnection policies.	Material	45	GRI 3-3
Number of employees with disabilities.	Material	45-46	GRI 3-3 GRI 405-1 regarding the distribution of employees by other diversity indicators.

Index of Contents Required by Law 11/2018			
Information Required by Law 11/2018	Materiality	Page of the report where the information is provided	Selected GRI Reporting Criteria <i>(Latest version unless otherwise specified)</i>
Organization of Work			
Organization of Working Time	Material	45-46	GRI 3-3
Number of hours of absenteeism.	Material	46	GRI 3-3 GRI 403-9 regarding absenteeism hours
Measures to Facilitate Work-Life Balance and Encourage Shared Responsibility Between Both Parents	Material	46	GRI 3-3
Health and Safety			
Working conditions related to health and safety.	Material	46-47	GRI 3-3 GRI 403-1 GRI 403-2 GRI 403-3 GRI 403-7
Workplace accidents, particularly their frequency and severity, as well as occupational diseases, broken down by gender.	Material	47	GRI 403-9 regarding the Number and Rate of Accidents GRI 403-10 regarding occupational diseases.
Social Relations			
Organization of social dialogue, including procedures for informing and consulting employees and negotiating with them.	Material	47	GRI 3-3
Mechanisms and procedures in place to promote employee involvement in company management, in terms of information, consultation, and participation.	Material	47	GRI 3-3
Percentage of employees covered by collective bargaining agreements, by country.	Material	48	GRI 2-30
Overview of collective bargaining agreements, particularly in the field of health and safety at work.	Material	48	GRI 3-3 GRI 403-4
Training			
Policies implemented in the field of training.	Material	48-49	GRI 404-2
Total number of training hours by professional category.	Material	49	GRI 3-3 GRI 404-1 regarding the total number of training hours by professional category
Universal Accessibility			
Universal accessibility for people with disabilities.	Material	51	GRI 3-3

Index of Contents Required by Law 11/2018			
Information Required by Law 11/2018	Materiality	Page of the report where the information is provided	Selected GRI Reporting Criteria <i>(Latest version unless otherwise specified)</i>
Equality			
Measures adopted to promote equality of treatment and opportunities between women and men.	Material	49-50	GRI 3-3
Equality Plans, measures adopted to promote employment, protocols against sexual harassment and harassment based on gender.	Material	50	GRI 3-3
Policy against all types of discrimination and, where applicable, diversity management	Material	51	GRI 3-3
RESPECT FOR HUMAN RIGHTS			
Management Approach: Description and results of policies related to these issues, as well as the main risks associated with these issues linked to the Group's activities.	Material	10-17, 19-21, 51	GRI 3-3
Application of Due Diligence Procedures:			
Procedures for human rights due diligence and prevention of human rights violations risks, and, where applicable, measures to mitigate, manage, and remedy possible abuses.	Material	51-53	GRI 2-23 GRI 2-26
Reports of human rights violations.	Material	52-53	GRI 3-3 GRI 406-1
Measures implemented to promote and comply with the provisions of the fundamental ILO conventions related to respecting freedom of association and the right to collective bargaining; eliminating discrimination in employment and occupation; abolishing forced or compulsory labour; and the effective abolition of child labour.	Material	51	GRI 3-3 GRI 407-1 GRI 408-1 GRI 409-1
FIGHT AGAINST CORRUPTION AND BRIBERY			
Management Approach: Description and results of policies related to these issues, as well as the main risks associated with these issues linked to the Group's activities.	Material	10-17, 19-21, 51	GRI 3-3
Measures Taken to Prevent Corruption and Bribery.	Material	51-53	GRI 3-3 GRI 2-23 GRI 2-26 GRI 205-2
Measures to Combat Money Laundering.	Material	51-52	GRI 3-3 GRI 2-23 GRI 2-26
Contributions to Foundations and Non-Profit Entities.	Material	53	GRI 2-28
COMPANY INFORMATION			
Management Approach: Description and results of policies related to these issues, as well as the main risks associated with these issues linked to the Group's activities.	Material	10-17, 19-21, 53	GRI 3-3

Index of Contents Required by Law 11/2018			
Information Required by Law 11/2018	Materiality	Page of the report where the information is provided	Selected GRI Reporting Criteria <i>(Latest version unless otherwise specified)</i>
Company Commitments to Sustainable Development			
impact of the company's activities on employment and local development.	Material	53-55	GRI 3-3
the impact of the company's activity on local populations and territory.	Material	53-55	GRI 3-3 GRI 413-1 GRI 413-2
The relationships maintained with local community stakeholders and the modes of dialogue with them.	Material	55-56	GRI 2-29 GRI 413-1
Actions related to partnerships or sponsorships.	Material	56	GRI 3-3
Outsourcing and Suppliers			
Inclusion of social, gender equality, and environmental issues in the procurement policy.	Material	57	GRI 3-3
Consideration of social and environmental responsibility in relations with suppliers and subcontractors.	Material	57	GRI 2-6
Monitoring and audit systems, and their results.	Material	57	GRI 2-6
Consumers			
Measures for consumer health and safety.	Material	19, 58-60	GRI 3-3 GRI 416-1
Complaint systems, complaints received, and their resolution.	Material	60-61	GRI 3-3
Tax Information			
Profits obtained by country.	Material	61	GRI 3-3
Corporate income taxes paid.	Material	61	GRI 3-3
Public subsidies received.	Material	61	GRI 201-4 regarding public subsidies received

The Directors of Nueva Pescanova, S.L.'s board present this Non-Financial Information Statement for Nueva Pescanova, S.L. and its subsidiary companies, for the year ending on 31 March 2024, which has been prepared based on the information provided by the Group's Management.

This report, along with the consolidated annual accounts and the management report, will be submitted to the auditor of the Parent Company for the issuance of the report required under Article 269 of the Consolidated Text of the Capital Companies Act.

Chapela, 13 June 2024

José María Benavent Valero
President

Jorge Juan Escudero Hurtado de Amezaga
Chief Executive Officer (CEO)

Javier Carral Martínez

Marco Enrique Nieto Montero