

Human Rights Policy

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Versions log

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VERSION	ACTION	DATE	CONTROL	PERSON RESPONSIBLE	ENTRY INTO FORCE	PERIOD OF VALIDITY
1,0	Approval	23/Jun/2022	Initial version (1.0)	Sustainability Dept.– Antonio Alvarez	23/Jun/2022	23/Jun/2022 Until the next update

1.Introduction

Within the framework of the sustainable development strategy, the social commitment policies reflect the Group's commitment to human rights, and the development of professional relationships based on diversity, inclusion, and a sense of belonging, which are fundamental to promoting equal opportunities and ensuring non-discrimination in the management of people.

1.1. Purpose of the Policy

The purpose of this Policy is to establish the principles and commitments of PROFAND FISHING HOLDING (hereinafter "Group") in the area of human rights.

Through this Human Rights Policy, the Group is committed to assuming its responsibility to respect human rights, formalizing both a due diligence process to identify, prevent, mitigate, and account for how it addresses the human rights impacts of its activities, and a process that makes it possible to make amends for any negative human rights consequences it has caused or contributed to.

1.2. Scope of application

This Policy applies to all Group employees, subsidiaries, business partners, and investee companies in which the Company owns, directly or indirectly, at least 50% of the share capital or voting rights. In addition, this Policy also applies to temporary joint ventures and other equivalent associations when the Company assumes responsibility for their management and supply chain.

1.3. Related regulations

This Policy is linked to the following regulations, in which the principles set forth therein are examined in detail:

- Civil Code
- Penal Code
- Equality and Diversity Program
- Code of Ethics and Conduct
- Supplier Code
- Sustainability Policy for Fishery Resources and Aquaculture
- PFH Criminal Risks Assessment Program

2. Profand Fishing Holding's general principles of conduct and human rights commitments

2.1. Our commitment- PFH Group employees

At Group, we envision a balanced world, where all impacts generated by our supply chain are kept below the limits that can be borne by nature, and where our responsibility integrates environmental and social challenges in the ecosystems and communities in which we operate and from which we source. The conservation and regeneration of ecosystems, the development of communities and the promotion of inclusion and diversity, ensuring the respect and promotion of human rights, are priority areas for achieving a positive impact, both on the planet and on society.

This Policy formalizes Group's commitment to respect internationally recognized human rights in all its business activities, all areas of operation, and in its supply chain.

The Group respects the principle international human rights frameworks and conventions, such as the International Bill of Human Rights, which contains the International Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights, as well as the United Nations (UN) "Protect, Respect and Remedy" Framework for Business and Human Rights, which includes the UN Guiding Principles on Business and Human Rights.

The Group supports the United Nations Global Compact, as a signatory, and its ten principles regarding human rights, labor practices, environment and anticorruption, the United Nations Sustainable Development Goals (SDGs) and the OECD Guidelines for Multinational Enterprises and their sectoral guidelines. We have conducted an assessment to identify the most important SDGs for our operations and supply chain. We report publicly on them and on our progress in this regard.

We are fully committed to the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, which means that we respect the right to freedom of association and collective bargaining, we are committed to providing equal pay and to the elimination of forced or compulsory labor, child labor and discrimination in employment and work. More details on these eight "fundamental" agreements are provided below:

1. *Freedom of Association and Protection of the Right to Organize Convention, 1948 (No. 87)*
2. *Right to Organise and Collective Bargaining Convention, 1949 (No. 98)*
3. *Forced Labor Convention, 1930 (No. 29) (and its 2014 protocol)*
4. *Abolition of Forced Labour Convention, 1957 (No. 105)*
5. *Minimum Age Convention, 1973 (No. 138)*
6. *Worst Forms of Child Labor Convention, 1999 (No. 182)*
7. *Equal Remuneration Convention, 1951 (No. 100)*
8. *Discrimination (Employment and Occupation) Convention, 1958 (No. 111)*

In addition, due to the nature of our work and the industry in which we operate, the Group is committed to the ILO Work in Fishing Convention, 2007 (no. 188), which ensures decent working conditions for all fishermen on board fishing vessels in commercial operations to meet minimum labor requirements on board, and the Code of Conduct for Responsible Fisheries of the Food and Agriculture Organization of the United Nations (FAO), a voluntary code that recognizes the nutritional, economic, social, environmental and cultural importance of fisheries and the interests of all stakeholders in the fishing sector.

2.2. Respect for the employees' rights

In our own operations, the employee rights that we are committed to upholding (see "Our Commitment") are embodied and summarized in the Group Code of Ethics and Conduct, which is binding for all Group employees and all Group companies, subsidiaries, and entities. The Group's commitments to its employees are set out in its Code of Ethics and Conduct and are enacted on a daily basis through internal guidelines and procedures. All employees must show respect for the human rights recognized in national and international legislation while executing their activities, in all countries in which they operate, and ensure compliance with this Policy. All employees are expected to act as the first line of defense for human rights, reporting any possible impact on them or any non-compliance with the Group's corporate policies.

2.3. Respect for communities' rights

The Group respects the rights of all communities involved in or affected by our business operations and supply chain. In particular, the Group aims to strengthen respect for the rights of ethnic minorities and indigenous peoples in the places where it operates or from which it sources. This is in line with Group's ethos of proactively contributing to the development of communities,

and with SDG 11 of the United Nations Sustainable Development Goals, regarding sustainable cities and communities.

2.4. Responsible procurement and human rights risk assessment

The Group's stated objective is to procure all goods and services based on sustainable criteria and to evaluate our suppliers with respect to environmental and social sustainability criteria, in line with the Group's Sustainability Policy for Fishery Resources and Aquaculture.

In order to more effectively assess labor conditions at all of our suppliers' sites and gain more transparency throughout our supply chain, we became a Sedex member in 2021 and started assessing our suppliers on the Sedex Platform. With this step, we can identify human rights risks and opportunities in our supply chain at an early stage.

Based on the risk level of our suppliers, we conduct on-site inspections by internal auditors or external audit firms based on the Sedex SMETA 4-pillar audit criteria or equivalent. We will integrate the results of these assessments into the relevant internal functions and processes to ensure that potential adverse human rights impacts are avoided and mitigated. Employees in the purchasing departments will receive specific training on human rights in supply chains, and we expect to extend this training to suppliers.

Any concern, complaint or discovery that someone is violating this Human Rights Policy, or the law, should be reported immediately using Group's whistleblowing channel, as described in the Group's Whistleblowing Protocol. It will be available to any person who, through their professional relationship with the Group's business activities, becomes aware of any type of improper or criminal conduct that contravenes this Policy and has been committed by any of Group's employees, subsidiaries, business partners, and/or suppliers.

2.5. Respect for human rights with business partners and in our supply chain

Our Supplier Code sets out the minimum standards of ethical and responsible behavior that we expect all business partners and suppliers to adopt in relation to working conditions, business ethics, and environmental impacts. We place special importance on the prevention of forced and child labor, fostering gender equality, decent working conditions, and the socioeconomic impact on our communities.

We expect our Supplier Code to be signed and accepted in writing prior to starting business activities. Our Supplier Code is supplemented by specific additional policies in which we clearly state our expectations of our business partners and suppliers.

Our business partners and suppliers are obliged to comply with the labor laws of the countries in which the Group operates and sources its supplies and, in addition, must show strict respect for the human rights recognized in national and international legislation in the execution of their activities, including those mentioned in this Policy. With regard to the investment partners that have operational control of the facilities in which the Group has an interest, their own policies shall be adjusted to be in line with this Policy, via the representatives in their management bodies. We expect our business partners and suppliers to demand these same commitments from their own supply chain.

The Group considers its business partners and suppliers to be fundamental in the compliance with this Policy and, therefore, they assume a shared responsibility with the Group. Specifically, business partners and suppliers, their employees and own suppliers shall:

- a) Adopt the necessary measures to eliminate any form of forced or compulsory labor.
- b) Expressly reject the use of child labor in their organization.
- c) Respect the freedom of association and the right to collective bargaining of their professionals, avoiding any discriminatory practices in employment and occupation.
- d) Set the salaries of their professionals in accordance with applicable laws, respecting minimum wages, overtime, and social benefits.

2.6. Stakeholder engagement

We understand that we cannot solve many of the challenges in the supply chain on our own. Therefore, we are increasingly engaging in industry cooperation and pre-competitive approaches to work together on long-term sustainable solutions, especially those affecting the fishing industry.

Among these, we are part of initiatives such as the Sustainable Fisheries Partnership (SFP), which aims to support a responsible and prosperous fishing economy, and the Organization for the Protection of South Atlantic Fisheries Resources (OPRAS), which actively works to address sustainability challenges related to fishing activity and industry in line with international law. In addition, the Group is also part of other responsible fishing initiatives, such as the Marine Stewardship Council (MSC), the Aquaculture Stewardship Council (ASC), the Boston Fisheries

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Foundation, and the Union Patronal des Mareyeurs Exportateurs (UPAMES), which promotes partnerships with local artisanal fishing councils in Senegal.

Understanding the importance of sharing knowledge in this industry, the Group supports the Gulf of Maine Research Institute, an independent organization dedicated to ecosystem resilience in the Gulf of Maine region.

Working together in the Pact of the Sea (Pacto del Mar), the Group is part of a group of leading fishing companies in North America and around the world dedicated to driving stewardship and continuous improvement in social, economic, and environmental responsibility throughout the global seafood supply chain.

We can better pursue and meet our sustainable procurement objective if we can have a direct influence on our upstream and downstream value chains. The Group is a member of Sedex, a leading global organization for the exchange of ethical trade data and the assessment of working conditions in supply chains. We are also part of the Global Sustainable Seafood Initiative (GSSI), a multi-stakeholder initiative that provides a globally consistent tool for the environmental aspects of seafood certification systems.



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