

# Human Rights policy

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# 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 Grupo Profand 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. General principles of conduct and Human Rights commitments of Profand Fishing Holding

### 2.1. Our commitment- PFH Group Employees

At Grupo Profand, we envision a balanced world, where all impacts generated by our supply chain are kept below the limits assumed by nature, and where our responsibility integrates environmental and social challenges in the ecosystems and communities in which we operate and source from. 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 Grupo Profand's commitment to respecting internationally recognized human rights across its business activity, all areas of operation, and its supply chain.

Grupo Profand respects key international human rights frameworks and conventions such as the International Bill of Human Rights, which contains the International Charter of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights, and the United Nations (UN)'s "Protect, Respect and Remedy" Framework for Business and Human Rights, which includes the UN Guiding Principles on Business and Human Rights.

Grupo Profand supports the *UN Global Compact* – as a signatory – and its ten principles on human rights, labor practices, environment and tackling corruption, along with the *UN Sustainable Development Goals (SDGs)* and the *OECD Guidelines for Multinational Enterprises* and its sectoral guides. We have undertaken an assessment to identify the most important SDGs to our operations and supply chain. We publicly report on these and our progress against them. We are fully committed to the *International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work*, meaning that we respect the right to freedom of association and collective bargaining, we are committed to providing equal remuneration and to the elimination of forced or compulsory labor, child labor, and discrimination in employment and occupation. More detail on these eight "fundamental" conventions can be found below:

1. *Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87)*
2. *Right to Organise and Collective Bargaining Convention, 1949 (No. 98)*
3. *Forced Labour 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 Labour Convention, 1999 (No. 182)*
7. *Equal Remuneration Convention, 1951 (No. 100)*
8. *Discrimination (Employment and Occupation) Convention, 1958 (No. 111)*

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

## 2.2. Respecting the rights of employees

In our own operations, the employee rights that we are committed to upholding (see “Our Commitment”) are captured and summarized in the Grupo Profand Code of Ethics and Conduct, which is binding for all employees of Grupo Profand and all group companies, subsidiaries and entities. Profand's commitments to its employees are set out in its Code of Ethics and Conduct and are reinforced daily through internal rules and procedures. While engaging in their activities, all employees must show respect for the human rights recognized in national and international legislation in all the countries in which they operate, ensuring compliance with this Policy. All employees are expected to act as a 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. Respecting the rights of communities

Grupo Profand respects the rights of all communities involved in or impacted by our business operations and supply chain. In particular, Grupo Profand aims to strengthen respect for the rights of ethnic minorities and indigenous peoples in the places where it operates or sources

from. This is aligned with Grupo Profand's ethos of proactively contributing to the development of communities, and with the aims of *UN SDG 11* on sustainable cities and communities.

## 2.4. Responsible procurement and assesment of Human Rights risks

It is Grupo Profand's declared goal to procure all goods and services based on sustainable criteria and to evaluate our suppliers with regard to environmental and social sustainability criteria, in line with the group's Sustainable Purchase of Fishing Resources Policy.

In order to more effectively assess the working conditions across our supplier sites and gain more transparency across our supply chain, we became members of *Sedex* in 2021 and started to evaluate our suppliers on the *Sedex Platform*. With this step, we can identify human rights risks and opportunities within our supply chain at an early stage.

According to our suppliers' risk level, we carry out on-site inspections through in-house auditors or external audit companies based on the *Sedex/SMETA 4 Pillar* approach or equivalent. We will integrate the results of such evaluations into the relevant internal functions and processes to ensure that potential adverse effects on human rights are prevented and mitigated. Employees of the purchasing departments shall receive specific training on human rights in supply chains, and we hope to extend this training to suppliers.

Any concerns, complaints or findings that someone is violating the present Human Rights Policy, or the law, should be reported immediately using Grupo Profand's whistleblowing channel as described in the group's Whistleblowing Protocol. This is available to anyone who, through their professional relationship with the group's business activities, becomes aware of any illegal or irregular misconduct that contravenes this policy, including all of Grupo Profand's employees, subsidiaries, business partners, and suppliers.

## 2.5. Respecting human rights with bussiness partners and in our supply chain

Our Supplier Code establishes 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 particular importance on the prevention of forced labor and child labor, the promotion of gender equality, decent working conditions, and the socioeconomic impact on our communities.

We expect our Supplier Code to be signed and accepted in writing before the commencement of business activities. Our Supplier Code is complemented by additional and specific policies in which we clearly express our expectations for our business partners and suppliers.

Business partners and suppliers are obliged to comply with the labor legislation of the countries in which the group operates and sources from and must also show strict respect for the human rights recognized in national and international legislation in their activities, including the ones mentioned in this policy. Regarding investment partners that have operational control of facilities in which the group has an interest, the alignment of their own policies with this Policy will be promoted through their representatives in their management bodies. We expect business partners and suppliers to enforce the same commitments in their own supply chain.

Grupo Profand considers its business partners and suppliers to be key to the fulfillment of this Policy and, therefore, they assume a shared responsibility with the group.

In particular, 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 union 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. We are therefore increasingly engaging with industry cooperation and pre-competitive approaches in order to work together on long-term sustainable solutions, particularly in those concerning the fishing industry.

These include memberships in initiatives such as the *Sustainable Fisheries Partnership* (SFP), which aims to support a responsible and thriving fishing economy, and the *Organization for the Protection of South Atlantic Fishery Resources* (OPRAS), which actively supports addressing sustainability challenges linked to the fishing activity and industry aligned with international law. Additionally, Grupo Profand is also part of other responsible fishing initiatives such as the Marine

*Stewardship Council (MSC), the Aquaculture Stewardship Council (ASC), the Boston Fisheries Foundation, and the Union Patronal des Mareyeurs Exportateurs (UPAMES), which promotes partnerships with local artisanal fishing councils in Senegal.*

By understanding the importance of the exchange of knowledge in this industry, Grupo Profand supports the *Gulf of Maine Research Institute*, an independent organization dedicated to the resilience of the ecosystem in the Gulf of Maine region.

Working together on the Sea Pact, Grupo Profand is part of the group of leading seafood companies from America and around the world dedicated to driving stewardship and continuous improvement of social, economic, and environmental responsibility throughout the global seafood supply chain.

We can best pursue and meet our goal of sustainable procurement if we can exert a direct influence on our upstream and downstream value chains. Grupo Profand is a member of Sedex, a leading international organization in ethical trading data exchange and in assessing working conditions across 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 schemes.

## 2.7. Implementation and updates to this policy

The group will carry out Human Rights due diligence processes on a regular basis in order to proactively identify human rights risks and impacts and to take appropriate measures to prevent and mitigate any issues, all the while promoting respect for human rights across its supply chain.

Grupo Profand is committed to allocating specific resources to ensure the effective implementation of the Human Rights Policy.

The policy shall be reviewed and updated when appropriate, in order to adapt it to changes that may arise in the business model or in the context in which the group operates, ensuring at all times its effective implementation.

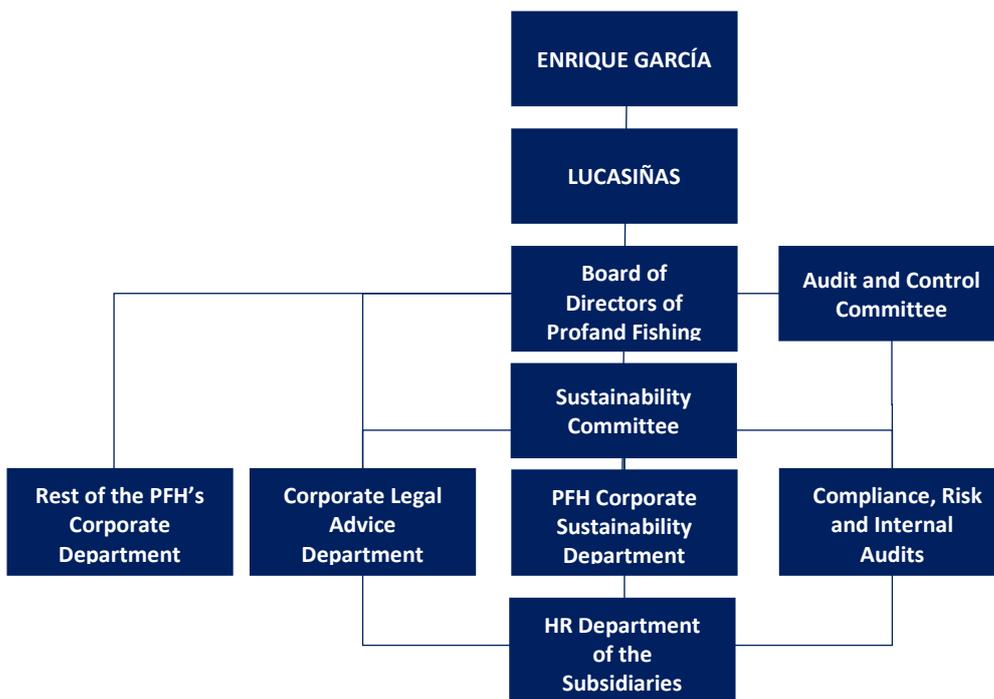
The Company's Board of Directors, through the Sustainability Department, will receive regular reports on the measures and procedures adopted by the group for the implementation and monitoring of the provisions of this Policy.

The Human Rights Policy will be made available to all the Company's stakeholders, both internally and externally, and will be appropriately communicated. Additionally, Grupo Profand can provide training and promote awareness-raising activities for its implementation throughout the organization and among its key stakeholders, including suppliers.

## 2.8. Supervision and monitoring system

At Profand Fishing Holding, the Sustainability Department is responsible for issues related to respect for human rights and reports quarterly to the Sustainability Committee, including the risks and impacts on all operations throughout the group's supply chain.

The Sustainability Department works with other departments to determine procedures for supplier monitoring and evaluation, and to identify the most salient human rights issues affecting the business. We report progress on these issues on an annual basis.



The Sustainability Committee is the delegated body of the Board of Directors responsible for supervising and controlling sustainability proposals, as well as relations with the different stakeholders. It is entrusted with the supervision of this Policy with respect to the matters within its competence.

*This policy was issued and approved by the Corporate Sustainability Department and the CEO of Profand Fishing Holding S.L.U. on June 23, 2022*



**PROFAND FISHING HOLDING – Vigo. 2022**

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