

# Supplier code

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## 1. Statement of motives

This "Supplier Code" has been created in order to satisfy the needs of our clients and also comply with the United Nations Guidelines on Trade and Human Rights as well as with the principles of the International Labour Organization. It establishes guidelines for PROFAND FISHING HOLDING -GRUPO LUCASIÑAS- along with its suppliers and the sub-suppliers contracted by them, based essentially on the quality of the services provided as well as integrity and compliance with current legislation on human rights and work ethics, occupational health and safety, and environmental protection.

It is the responsibility of suppliers to disclose, educate, and act diligently in verifying compliance with this Code when it comes to their employees, agents and subcontracted suppliers.

## 2. Scope of application of the Code

### 2.1. Scope of the Profand Fishing Holding supplier code

The Supplier Code contains a set of ethical principles and rules of conduct that must govern the actions of all PROFAND FISHING HOLDING suppliers.

This code applies to PROFAND FISHING HOLDING's suppliers and describes our expectations regarding their commitment to our responsible sourcing objectives. The Code applies to all the workers and employees of any Grupo Profand supplier (including permanent workers, temporary workers, contractors, service providers, and migrants) and its own suppliers. It also applies to any subcontractors and third-party employment agencies.

We are aware that our suppliers may have their own responsible sourcing and due diligence policies within their own supply chains and with their business partners. While we encourage this, we expect our suppliers' and partners' principles and processes to reflect our own, aligning with and implementing the expectations set out in this document. Therefore, these suppliers are responsible for diligently educating all workers and employees defined to be within this scope to ensure compliance with this Supplier Code of Conduct by their employees, agents, and subcontracted suppliers.

The rules of the Code do not replace the provisions of any agreement or contract between the suppliers and Profand Fishing Holding, but they must be implemented in conjunction with those

provisions. Failure to comply with the requirements of this Code of Conduct or a lack of evidence demonstrating compliance may result in actions up to and including termination of the business relationship following appropriate written communication.

## 2.2. Compliance

PROFAND FISHING HOLDING requires its suppliers to comply with and respect a series of non-negotiable minimum standards. Their compliance is essential for the maintenance of the business relationship between PROFAND FISHING HOLDING and its suppliers.

All suppliers and their business activities must comply with the prevailing laws and regulations in the countries and jurisdictions in which they operate.

Suppliers must comply with all other applicable international laws and regulations, including those related to international trade, sanctions, and the control of exports. Where local law and this policy address the same issue, the supplier must comply with the requirement that confers greater protection to the rights holder (i.e., the worker).

Suppliers must declare any conflicts of interest in any business practice or relationship related to PROFAND FISHING HOLDING and actively seek to avoid such conflicts.

All forms of bribery, kickbacks, fraud, corruption, money laundering, extortion, embezzlement, misappropriation, mismanagement, and unethical practices that aim to influence decision-making processes are prohibited, regardless of whether or not these processes violate the applicable laws. Suppliers must have a zero tolerance policy and prohibit any such behavior.

Suppliers shall inform PROFAND FISHING HOLDING if they have been convicted of or are in criminal proceedings for the commission of a possible financial crime; this includes the members of the Governing Body, general management, financial management, or any of their other managers and/or representatives. In such cases, PROFAND FISHING HOLDING reserves the right to terminate the business relationship with the supplier immediately.

If a PROFAND FISHING HOLDING employee were to engage in any of the above, the supplier must immediately inform PROFAND FISHING HOLDING management.

Subcontracting on behalf of PROFAND FISHING HOLDING in the provision, creation, or production of goods or services for PROFAND FISHING HOLDING is prohibited without prior written authorization.

Suppliers must protect PROFAND FISHING HOLDING's confidential information and intellectual property and must not share this information unless this is expressly authorized by PROFAND FISHING HOLDING.

PROFAND FISHING HOLDING reserves the right to verify compliance with the Code through internal or external evaluation mechanisms, reserving the right to terminate the business relationship immediately, with the corresponding written notice, in case of non-compliance with this Code.

### 2.3. Obligation to know and comply with the Code

The subjects referred to in the previous section are obliged to know, understand, and comply with the Code and to collaborate in its implementation at PROFAND FISHING HOLDING, and must inform the responsible parties of any breach of the Code that may occur.

The obligation for the associated persons to be aware of the Code must be supported, so those responsible for it have the duty to promote such knowledge, implementing initiatives or mechanisms that contribute to its dissemination. This dissemination is the main duty of the control body.

Suppliers must accept this Code as a prerequisite for all contracts entered into with any of the companies that are part of PROFAND FISHING HOLDING. By signing the contract, the supplier undertakes to comply with each and every one of the guidelines and standards of conduct contained in this Code when carrying out their activities. The standards of the Code do not replace the provisions of any agreement or contract between the suppliers and PROFAND FISHING HOLDING, but they must be implemented in conjunction with those provisions.

Notwithstanding the foregoing, in certain specific matters that require detailed regulation, the rules of this General Code shall be supplemented by those contained in sectoral codes and manuals.

### 2.4. Management systems

Suppliers shall create and enforce policies and procedures to ensure compliance with all the aspects of this policy. This includes ensuring transparent and accurate record keeping and

maintaining these records to demonstrate compliance with the applicable laws and with this policy.

If issues arise or a significant risk of non-compliance with this policy is identified, PROFAND FISHING HOLDING may request supply chain transparency regarding the particular goods or services in question provided to PROFAND FISHING HOLDING, with respect to the responsible sourcing problems identified in this policy.

## 3. General ethical principles of the group

### 3.1. Regulations, working conditions, and human rights

Forced, bonded, and involuntary labor:

- PROFAND FISHING HOLDING expressly prohibits any form of forced, bonded, or involuntary labor, any form of modern slavery, physical abuse, confinement, or threats of violence as a method of discipline or control, as defined by International Labour Organization (ILO) conventions and national laws.
- Suppliers must ensure that all jobs are chosen freely and that workers can leave their jobs without penalty if reasonable notice is given.
- Suppliers can not retain passports or identity documents (unless required by law), and workers must have free and full access to their documentation if it is retained.
- Workers' movement must not be restricted and workers may not be confined to the supplier's premises, including work or accommodation facilities.
- Workers should not have to pay hiring fees or be required to deposit money with the supplier.
- Suppliers must provide all employees with a written contract in a language they understand at the start of employment or service. This contract must also be signed by the employee of his or her own free will. This contract should include key details on topics like expected salary, work hours, voluntary resignation notice period, benefits, licensed rights, terms and conditions, and any disciplinary and grievance mechanisms.

## Child labor and young workers

- Child labor is expressly prohibited. A "child" is defined as any person under 16 years of age, or under the minimum age for employment in the country of residence, whichever is higher.
- Workers under the age of 18 should not experience conditions at work that are mentally, physically, socially or morally hazardous or that hinder their development or interfere with their schooling. When employing young workers, care must be taken to ensure that children and young workers do not perform hazardous work or night work.
- All employment of young workers, including apprentices and students in professional training, must comply with the laws and regulations regarding the minimum working age and compulsory school age and must be of educational benefit.

## Wages and benefits

- Suppliers must pay employees wages and benefits that meet at least the minimums required by the government or those agreed upon by the industry's collective authority, whichever is higher. Wages must be paid at regular intervals that are agreed upon in the worker's contract and must be provided along with a pay stub or valid document verifying the exact compensation for the work performed.
- Suppliers must ensure that workers understand and receive any benefits or compensation to which they are legally entitled, including paternity leave, paid vacation, and social security. Docking wages as a disciplinary measure or any deduction from wages not provided for by national laws should not be permitted without the express permission of the employee involved. All disciplinary actions must be recorded.

## Working hours

- Working hours must comply with national laws, collective bargaining agreements, and/or the provisions of ILO conventions, whichever provides the greatest protection.
- All overtime must be voluntary and must be duly compensated at the legally required or collectively agreed-upon premium, whichever is greater. Under normal circumstances, the , total hours worked in a 7-day period should not exceed 60, and should not exceed 72 hours if voluntary overtime is included.
- Under exceptional circumstances, working hours may exceed 72 hours per week. These exceptional circumstances are when all of the following criteria are met:

- a) It is permitted by national legislation.
- b) It is permitted by a collective bargaining agreement that has been freely negotiated with an organization of workers representing a significant part of the workforce (inasmuch as a collective bargaining agreement exists).
- c) Appropriate safety measures are taken to protect the health and safety of workers.
- d) The employer can demonstrate that exceptional circumstances apply, such as unexpected production peaks, accidents, or emergencies.
- e) Workers should have at least one day off every seven days or, where permitted by national legislation, two days off in a 14-day period.

### Regular employment

- To the extent possible, the work performed should be based on recognized labor relations that are established in national laws and practices.
- Obligations to employees under labor or social security laws and regulations arising from regular employment relationships should not be avoided through the use of labor-only contracting, subcontracting, or home-based work arrangements, or through apprenticeship schemes where there is no real intent to foment skills or provide regular employment, nor should such obligations be avoided through the excessive use of short-term employment contracts.

### Migrant workers

- Migrant workers should receive the same treatment as other workers performing the same or similar work. Migrant workers must have the same rights as local workers, as stipulated by local laws.
- The supplier must take measures to ensure that migrant workers are able to work safely, understand their duties, rights and responsibilities, and have mechanisms for reporting problems, especially when the worker's language is not the employer's business language.
- · Only workers who can legally work should be employed or utilized by the supplier partner.
- · The legal right to work of all workers, including staff sent by employment agencies, must be validated by reviewing original documentation.

## Discrimination and working conditions

- All workers must be treated with dignity and respect (including migrant and temporary workers). No worker should be subjected to any form or threat of harsh or inhumane treatment, including physical, sexual, psychological, verbal harassment or abuse, or intimidation.
- All employment decisions (including hiring, firing, compensation, promotion, and discipline) must be based on the worker's ability and willingness to do the job and the criteria permitted by local laws.
- There must be no discrimination on the basis of race, color, sex, physical aptitude, national or social origin, religion, age, disability, sexual orientation, gender identity, marital or civil status, political affiliation, pregnancy status, medical condition, or past or present union membership.
- Except when required by applicable laws or regulations or when essential for workplace safety, suppliers must not require medical or pregnancy testing and must not unduly discriminate on the basis of test results.
- Suppliers must have anonymous, confidential, and fair grievance mechanisms for workers, including whistleblowing mechanisms. Suppliers must ensure that reports can be made without fear of reprisal or retaliation.

## Freedom of association and collective bargaining

- Suppliers shall respect the legal rights of workers regarding freedom of association and collective bargaining, in accordance with applicable laws and regulations.
- The employer should adopt an open attitude towards the activities of trade unions and employee representation groups and their organizational activities.
- Workers' representatives should not be discriminated against and should have access so they can carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted by local laws, the employer should facilitate and not hinder the development of parallel means for independent and free association and collective bargaining.

### 3.1.1. Prevention of occupational hazards and safe conditions

PROFAND FISHING HOLDING considers the occupational health and safety of the Code Subjects essential for a comfortable and safe working environment, with the continuous improvement of working conditions being a priority. Therefore, the Code Subjects shall respect the applicable preventive measures on occupational health and safety at all times, and shall undertake to:

- Provide a safe and hygienic working environment and, at a minimum, comply with all applicable health and safety laws.
- Provide clean drinking water and clean sanitary facilities for workers at all times, along with access to hygienic food preparation, storage, and consumption areas.
- Equip the work environment with adequate ventilation, a comfortable working temperature, and lighting.
- Take adequate measures to prevent accidents and health problems arising from, associated with, or occurring during the course of work, minimizing, as far as reasonably possible, the dangers inherent to the working environment.
- Prevent occupational hazards and risks by having evacuation procedures, drills, and an emergency response in place, along with adequate first aid supplies, adequate fire detection and extinguishing equipment, and appropriate emergency exits.
- Where necessary, workers should be provided with free, appropriate, and well-maintained personal protective equipment and educational materials, as well as training on the risks associated with these hazards.
- Suppliers must respect the right of workers to refuse unsafe work and to report unhealthy or unsafe working conditions.
- Workers must receive adequate and well-documented training to perform their work safely.
- Suppliers are expected to appoint a senior management representative to be responsible for health and safety within their organization.
- All records of accidents and injuries should be properly maintained, with all significant accidents and near misses investigated and corrective actions taken to minimize any recurrence.
- Where required by local law, suppliers must provide workers' compensation to all workers, covering medical treatment for work-related accidents and compensation for work-related accidents resulting in permanent disability.

## Accommodation

- When provided, workers' accommodation must meet or exceed the basic standards offered in the local community.
- Workers must be free to enter and leave the accommodation at will.
- If workers pay for accommodation, the cost should not be excessive or constitute the majority of their wages.
- Whenever possible, safe transportation should be provided between the accommodation and the workplace.

- This housing must provide gender segregation for sleeping, living, and washing facilities when necessary. It should also allow families to live together whenever possible.
- The accommodation must meet or exceed local legal health and safety standards, and inspection and maintenance records must be kept.
- The lodging facility must have a fire safety plan that includes training fire prevention agents, periodic testing and monitoring of equipment, and fire safety drills. This plan should be communicated to workers and displayed within the facility in the required languages.
- The heating, air conditioning, and ventilation must be appropriate for the climate conditions and provide workers with a comfortable and healthy environment to rest and spend their leisure time. Both natural and artificial lighting should be provided.
- Workers must be provided with sufficient sanitary facilities, including hand washing areas, showers and toilets with adequate privacy, located at a reasonable distance from other facilities and sleeping rooms, and these must be maintained in good working condition and cleaned frequently.
- Storage facilities must be provided for workers' personal effects, work clothes, and protective equipment.

## 3.2. With Sustainable Fisheries and the Environment

The commitment to sustainable and environmentally friendly fishing is a vital part of the group's culture, embodied in the Profand 4 Future strategy. For this reason, from an environmental sourcing perspective, suppliers must comply with all applicable local and national environmental legislation.

- Where required by law, the supplier should maintain environmental records and certificates.
- Hazardous materials and chemicals must be disposed of in accordance with the law.
- Suppliers must identify and reduce their use of hazardous materials, chemicals, and substances. Suppliers must also ensure their safe handling, transport, storage, recycling, use, and/or disposal. All the employees involved must be aware of and trained in the related safety procedures.
- Business must be conducted in a manner that proactively embraces sustainability.
- Suppliers must optimize their consumption of natural resources, including energy and water.

- Business must also be conducted in a manner that reduces environmental impact. As such, suppliers must measure and minimize the environmental impact of their facilities and operations, including greenhouse gases and air pollution, water pollution (whether in a production process, for irrigation, or other uses), waste, land degradation, and forest use.
- Suppliers must comply with certifications where applicable or required by local laws and with industry standards provided by the International Organization for Standardization (ISO) and/or other relevant entities.

## Responsible Fishing

- Suppliers operating in the fishing industry must adopt responsible practices to ensure the conservation, management, and effective development of living aquatic resources, in harmony with the environment and respecting the labor rights of those working in the industry, in line with Profand Fishing Holding's Sustainable Sourcing of Fishery Resources and Aquaculture Policy and the Code of Conduct for Responsible Fisheries of the Food and Agriculture Organization (FAO).
- Suppliers must operate in a manner that protects and conserves the marine environment, its resources, and its biodiversity through the rational and sustainable management of fishery resources.
- Suppliers are prohibited from using explosives, poisoning, and other comparable destructive fishing practices.
- Suppliers should promote and contribute to the development of fishery improvement projects aiming for greater sustainability in strategic fisheries.
- Whenever possible, suppliers are expected to support artisanal fisheries through agreements with local fishermen's organizations.
- Suppliers must effectively manage their waste and minimize their environmental impact, respecting the applicable regulations in the work centers and fishing vessels associated with their activity.
  - Suppliers must use technologies, materials, and operating methods that minimize fishing gear loss and the effects of ghost fishing due to lost or abandoned gear, along with their impact on biodiversity and coastal fishing communities.

### 3.3. Prohibition on hiring

None of the companies that are part of PROFAND FISHING HOLDING may enter into contracts with suppliers that have been convicted of committing a financial crime or are involved in

criminal proceedings for the possible commission of any crime of this kind, such as those listed below:

- Money laundering.
- Corruption.
- Scams.
- Mismanagement.
- Misappropriation.

Suppliers are obligated to inform PROFAND FISHING HOLDING if they have been convicted of or are in criminal proceedings for the commission of a possible financial crime; this includes the members of the Governing Body, general management, financial management, or any of their other managers and/or representatives.

In this case, PROFAND FISHING HOLDING reserves the right to terminate the business relationship with the supplier immediately.

## 4. In case of non-compliance

PROFAND FISHING HOLDING wishes to foster productive, long-term relationships with its suppliers. Therefore, each supplier audit or scandal that violates this code may lead to a corrective action plan negotiated between the supplier and the corresponding PROFAND FISHING HOLDING managers, with the exception of serious misconduct (corruption, forced labor, child labor, opaque subcontracting), which will result in the immediate termination of business relations.

In case of non-compliance with the corrective action plan, PROFAND FISHING HOLDING is authorized to immediately terminate its business relationship with the supplier in question. PROFAND FISHING HOLDING reserves all rights to terminate business relations in case of serious violations of human rights, children's rights, undeclared subcontracting, a deliberate violation of moral or ethical sense, and/or a persistent lack of cooperation, as well as in case of corruption or attempted corruption.

This Code will evolve according to practical experience, changes in circumstances, and legal requirements or updates to the Suppliers' Ethical Charter. PROFAND FISHING HOLDING will continue to ensure that this Code is regularly reviewed, updated and communicated to all its Partners. By signing this Code, the Partner undertakes to comply with the provisions of this Code and ensure that it is respected by its subcontractors and business partners.

## 5. Communication

### 5.1. Complaints channel

- a) Suggestions, queries or proposals related to the Supplier Code may be made through the following channels:
- E-mail address: [canaletico@profand.com](mailto:canaletico@profand.com)
  - Mailing address: Supplier Code Queries, C/ García Barbón, 62, Bloque 1, 36201- Vigo
- b) The queries made will be examined by the control body responsible for the Supplier Code and will comply with the requirements of the prevailing data protection regulations. Queries will not be admitted through any other channel apart from those mentioned above.
- Upon receipt of a complaint, the control body will conduct an internal investigation under the terms of the Complaints Protocol.
  - In its internal investigation, the control body may obtain all the information and documentation it deems appropriate from any PROFAND FISHING HOLDING department.
  - The control body shall periodically inform the Governing Body of the complaints received and the outcome thereof.

### 5.2. Contacts for problems and review period

This Code is the property of PROFAND FISHING HOLDING. If you have any questions about this policy or any of the requirements contained herein, please first contact the Sustainability department at [sostenibilidad@profand.com](mailto:sostenibilidad@profand.com).

The policy and supporting documentation will be reviewed annually or as needed. Any changes will be communicated to suppliers through their first point of contact. All major changes will be formally communicated. This will be publicly available to all suppliers. Suppliers must sign this policy annually to acknowledge any updates and confirm their commitment to the principles required in the code of conduct.

## 6. Supervision program

The control body of PROFAND FISHING HOLDING will establish a Supplier Code monitoring program that it will review annually to ensure that it is up to date and carry out ongoing verification.

*This Supplier Code 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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