

CRIMINAL COMPLIANCE POLICY

JEALSA

V3-2024

1.- CONTEXT AND PURPOSE OF THE POLICY

This policy is aligned with the Code of Ethics and Conduct and JEALSA's Anti-corruption Policy, and is based on absolute respect for the values, principles, and guidelines of behavior that are included in said documents, and which reflect the organization's will to comply with regulations, as well as its zero tolerance for any irregular conduct or conduct suspected of constituting a crime or corrupt practice.

The most significant activities carried out by the companies that form part of JEALSA are:

- Manufacture and marketing of all kinds of canned fish, shellfish, and food products, preferably extracted from the sea, fishing and marine crops.
- Manufacture and marketing of fish flours and animal feed.
- Distribution of natural products acquired from third parties.
- Operation of ships dedicated to tuna fishing, operation of refrigerated industries for freezing, preservation, and transformation of raw materials, as well as the purchase and sale thereof.
- Production, reuse, and recycling of waste, especially from the same activity.
- Purchase, sale, marketing, transformation, and processing of oils, fats and derivatives
- Technological research and development on all kinds of products and byproducts obtained from the sea or rivers, preferably through fishing or aquaculture.
- Promotion, design, construction, and operation of wind farms and management of high-efficiency co-generation power plants and other forms of electricity production associated with high-efficiency non-electricity activities.
- Hydroelectric production facilities under the special regime.
- Provision of advisory, management, information, and technical support services related to marketing, merchandising, advertising, communication, and image, public relations, culture, and education, and, in general, any other information technology and communication technology.

This policy is aligned with the organization's Integrated Criminal and Anti-Bribery Compliance Management System (SIGCPAS), which has its corresponding criminal risk matrix that envisages all the crimes applicable to the legal person pursuant to the applicable criminal legislation, existing controls and action plan, in which the criminal risks to which JEALSA is exposed, the mechanisms for controlling them and the additional measures to be implemented to improve the current risk control mechanisms are analyzed.

All the crimes for which the legal person is liable have been envisaged and assessed on a criminal risk map and a technical instruction that forms part of the SIGCPAS.

The purpose of this policy is to evidence the firm commitment of all the members of the organization to fulfill internal and external regulations, with absolute respect for JEALSA's values and ethical principles.

2.- SCOPE OF APPLICATION

This policy shall apply to all the companies that form part of the group of companies whose Parent is Corporación Empresarial Jesús Alonso, S.L. (and which is generically called "JEALSA" in this document and in all the SIGCPAS), in addition to all the activities carried out regardless of their location, in Spain or abroad, and applies equally to employees, executives and the Governing Body.

JEALSA's employees shall ensure that the application of this policy extends to third parties, customers, suppliers or related parties, requesting their express compliance therewith, when possible due to the nature of the relationship.

3.- PRINCIPLES OF CONDUCT.

JEALSA promotes responsible and transparent action by all its members, in accordance with the principles and values of its Code of Conduct and showing zero tolerance for the commission of illegal acts.

To this end, it has established the following action principles:

- Promotion of the compliance culture: The organization's senior management shows leadership, integral action and commitment to the compliance culture, always marked by the scrupulous respect for both internal regulations (Code of Ethics and Conduct, compliance policies, and other documents, voluntarily assumed commitments) and external regulations, duly penalizing any noncompliances of which it becomes aware.
- Due diligence, understood as the need to obtain and analyze the information for adequate decision-making.
- Legal and regulatory compliance: as a result of the aforementioned compliance culture, the organization shall always act in compliance with the legislation in force, particularly criminal legislation, in addition to any internal regulations, and commitments and/or

requirements voluntarily assumed.

- Zero tolerance for any irregular conduct and that may constitute a crime or corrupt act.
- Transparency, honesty, integrity, and impartiality in relationships, both internal and external. No form of bribery or dishonest offers or payments shall be allowed.
- Establishment of an adequate framework for defining, reviewing, and achieving the criminal compliance objectives established by JEALSA.
- Identification, control, and minimization of criminal risks: A risk matrix was created in which the organization's criminal risks have been identified, establishing controls aimed at preventing and/or mitigating the commission of said risks, in addition to establishing action plans and improvement mechanisms for endowing the organization with efficient controls to mitigate the identified risks.
- Appointment of a criminal compliance body (Compliance Committee) in charge of implementing, monitoring and supervising the system, endowed with the necessary principles of authority and independence to discharge its functions.
- Monitoring of the effectiveness and efficiency of the system through measurable results indicators.
- Obligation to report conducts that potentially contravene the applicable internal or external regulations: To this end, the organization has a WHISTLEBLOWING CHANNEL (<https://jealsa.com/compliance/>) endowed with the principles of indemnity, confidentiality, independence, and impartiality so as to guarantee all of the reporting person's rights, which is adapted to the Ley 2/2003, 20th February.
- Supervision and assessment of the effectiveness of the system in a planned and scheduled way.
- Commitment to continuously improve the effectiveness and efficiency of the Integrated Criminal and Anti-Bribery Compliance Management System, by monitoring its objectives, the results of internal and external audits, analyzing its actions and review by the senior management.
- Promotion of training in and communication of the Compliance Management System.
- Impose the relevant disciplinary measures in accordance with the applicable labor legislation in the case of noncompliance with this Policy or with the requirements arising from the SIGCPAS, all pursuant to the Code of Ethics and Conduct and the Ethical Channel Management Manual.

4.- COMPLIANCE COMMITTEE AND SYSTEM ELEMENTS.

JEALSA has appointed a Compliance Committee, which will be in charge of ensuring compliance with this policy and with the rest of the Integrated Criminal and Anti-Bribery Compliance Management System. This collegiate body is endowed with sufficient resources and with the principles of AUTHORITY AND INDEPENDENCE.

Thus, the Compliance Committee has sufficient autonomy to carry out its essential duties without need for specific mandates. To this end, the organization's administrative body will delegate sufficient powers and competencies thereto to discharge its duties continuously and without need for authorization.

It is an independent body, which guarantees neutrality in the decision-making process.

In addition to the Compliance Committee, JEALSA's Integrated Criminal and Anti-Bribery Compliance Management System is supported by this criminal compliance policy and by the rest of the internal regulations, controls, procedures and processes approved and reviewed for supervising and monitoring the criminal risks that affect the organization. Thus, JEALSA has a Code of Conduct, an Anti-Corruption Policy or a criminal risk assessment and identification matrix, inter alia. Moreover, the system is based on compliance training and sensitization, the existence of a whistleblowing channel, planned supervision and monitoring, and the continuous improvement of the system; effectively preventing the commission of illegal crimes and achieving the planned objectives; all of which contributes to the effectiveness and efficiency of the system.

5.- COMMUNICATION

This Policy (and its eventual updates) shall be provided or be easily available to all its recipients, being published on the corporate website and delivering a copy thereof to new hires. Additionally, it shall form part of the Organization's training plans.

Furthermore, it shall be transmitted to those business partners and stakeholders when necessary to fulfill the principles established herein.

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