




SUPPLIER AND PURCHASING POLICY

1. VALUES AND SCOPE OF APPLICATION	2
2. CRITERIA IN SELECTING SUPPLIERS.....	2
3. ETHICAL COMMITMENTS OF THE SUPPLIERS.....	4
4. COMMITMENTS IN MATTERS OF SUSTAINABILITY	6
5. WHISTLEBLOWING CHANNEL AND DISCIPLINARY REGIME	7
6. PUBLICITY AND TRAINING.....	7
7. VALIDITY AND REVIEW	8

 JEALSA	Integrated Criminal and Anti-Bribery Compliance Management System (SIGCPAS)			
Title SUPPLIER AND PURCHASING POLICY	Code		MG-05	
	Version	02	Date	12/30/2021

1. VALUES AND SCOPE OF APPLICATION

JEALSA, which is made up of all domestic or foreign companies directly or indirectly owned or controlled by CORPORACIÓN EMPRESARIAL JEALSA, SL, understands the relationships with its different suppliers from the viewpoint of mutual respect, trust, shared values, environmental protection, solidarity, and quality.

Our suppliers are essential to carrying out the appropriate provision of services and proceeding to sell high quality products to our customers; therefore, our relationship shall be governed by the highest standards of commitment and correction, mutually demanding their collaboration and involvement in order to achieve our goals and purposes.

This policy shall apply to all members of the JEALSA organization, and must be observed by any member of the organization or any person/company acting on behalf of the organization, with functions or responsibilities regarding the selection and/or contracting of suppliers and negotiation of purchases of products or contracting of services. Likewise, this policy shall be completed with the Approval and Maintenance protocols for Suppliers dated 22/06/2018 and for Sales dated 22/05/2018.

2. CRITERIA IN SELECTING SUPPLIERS.

JEALSA selects its suppliers based on two main groups of criteria:

On the one hand, criteria based on supplier evaluation as demanded by the **ISO 9001 standard**:

- **General Supplier Profile.** Special consideration shall be given to the recognition of their activity, prestige, track record in the market, response capacity, and strict compliance with quality standards.




**Integrated Criminal and Anti-Bribery Compliance
Management System
(SIGCPAS)**

Title	Code		MG-05	
	Version 02		Date	12/30/2021

- Quality. Main criteria to take into account when evaluating a supplier. JEALSA shall engage suppliers that offer input, products and services of very high quality and in accordance with the price.
- **References.** The opinion of our customers or other companies who have established relations with a certain supplier is an important factor when making a selection. The image and prestige that others have of a certain brand or company is considered to be fundamental.
- **Price.** Even though not a decisive factor, it is taken into account as a complement to the other criteria. We must strive to select suppliers with reasonable prices, which are in line with the quality of the product or service they offer, as well as the average market prices.
- **Respecting delivery deadlines.** A high level of compliance and speed in processing is required. Failure to comply with deadlines is one of the most important criteria when evaluating a supplier. The delivery period shall be tailored to the organization's needs and orders shall be delivered at the agreed-upon time.
- **Technology and Facilities.** It is important that the supplier has technological tools that increase the quality of the products as well as adequate distribution and marketing facilities and networks.
- **Corporate philosophy.** It is important when selecting a supplier that shares elements common to JEALSA's corporate philosophy as well as the values and principles contained in our code of ethics and conduct.

Furthermore, criteria on regulatory compliance by suppliers and compliance with the sustainability guidelines of the ISSF (International Seafood Sustainability Foundation):

- **Sustainability.** It is important that suppliers make every effort to strike a balance between economic growth, environmental care, and social welfare throughout their value chain.
- **Fight against corruption.** It is important that the supplier has the means and methods to fight against corruption, especially considering the states in which it operates and the sector of economic activity.
- **Respect for the law.** It is important that the supplier has Compliance systems and regulatory compliance control.

 JEALSA	Integrated Criminal and Anti-Bribery Compliance Management System (SIGCPAS)			
Title SUPPLIER AND PURCHASING POLICY	Code		MG-05	
	Version	02	Date	12/30/2021

Every year, an internal evaluation of all suppliers will be carried out by the department designated by the Compliance Committee, through which compliance with the criteria stated will be verified.

3. ETHICAL COMMITMENTS OF THE SUPPLIERS.

This section will discuss the ethical principles that shall preside over the performance of the suppliers of the companies of the JEALSA Group and will be inexcusably accepted by them before beginning the contractual relationship. All the above will be applicable without prejudice to the additional conditions and requirements that may be contemplated under applicable legislation and in the regulations of the different jurisdictions where JEALSA carries out its activities.

CRITERIA OF PROFESSIONAL ETHICS


Ethical and responsible behavior. Relations with suppliers will be carried out under criteria of honesty, respect for people, and respect for social and environmental values, ensuring compliance with the law in force in all areas of action.

The general contracting conditions will not include clauses that are abusive, against good faith, or the fair balance between the rights and obligations of the entity and the supplier.

Professionalism. Suppliers shall show an attitude in the performance of their activity that is honest, ethical, and loyal to the obligations assumed in the commercial relations carried out with JEALSA, acting professionally and showing an active attitude aimed at excellence in their work.

Respect for the law. Suppliers shall fulfill JEALSA Group's policies, rules and procedures relative to the prevention of corruption, bribery and extortion, in addition to the strictest ethical and moral conduct rules, international agreements and fulfill the applicable laws in this regard, making sure to establish the adequate procedures required for such purpose.

To this end, suppliers who contract with the JEALSA organization will be required to strictly fulfill our Code of Ethics and our Anti-Corruption Policy, in order to ensure

 JEALSA	Integrated Criminal and Anti-Bribery Compliance Management System (SIGCPAS)			
Title SUPPLIER AND PURCHASING POLICY	Code		MG-05	
	Version	02	Date	12/30/2021

behavior in line with the culture of compliance assumed by the Group, within the framework of a full, ethical, responsible, sustainable, and environmentally friendly performance. Said strict fulfillment shall be documented in writing and stored together with the company's official documentation.

Transparency. Suppliers shall develop their business relationships according to the principle of transparency in management, always providing accurate, timely, truthful, and complete information.


Conflict of interest. Suppliers shall maintain mechanisms that guarantee that, in the event of a potential conflict between the interest of the supplier and the personal interest of any of its employees, the independence of the supplier's performance and its full compliance with applicable legislation will not be affected.

Duty of secrecy of the suppliers. All information owned by JEALSA of which the supplier is aware due to the existence of commercial relations will, in general, be considered confidential and secret information, having the standing of business secrecy. The supplier and all the staff at their service shall adopt sufficient security measures to protect all confidential and secret information.

PRINCIPLES OF HUMAN AND LABOR RIGHTS

Labor rights. Suppliers shall adopt the necessary measures to guarantee the fulfillment of the following principles:

- **Freedom of association and effective recognition of the right to collective bargaining** with the aim of offering full protection of workers' rights.
- **Prohibition of any practice that constitutes abuse, harassment or discrimination** on the grounds of age, race, language, political ideology, sexual orientation, gender or religion.
- **Prohibition of child and forced labor**, to which end it shall be necessary to establish procedures that will ensure that said practices are not present in JEALSA's supply chain. Hiring children under 16 years of age is prohibited, except in cases where the applicable legislation establishes a higher age.

 JEALSA	Integrated Criminal and Anti-Bribery Compliance Management System (SIGCPAS)			
Title SUPPLIER AND PURCHASING POLICY	Code		MG-05	
	Version	02	Date	12/30/2021

- **Regulation of salaries, benefits and contracts:** all workers shall have an employment contract pursuant to law, which at least establishes the duration, salary, working hours and rest periods, as well as the right to holidays.
- **Occupational health and safety:** all workers shall be guaranteed health and safety coverage.
- Those suppliers who contract with JEALSA shall have **whistleblowing channels** open to all those who have a relationship with the organization.

All the foregoing principles apply and are required of all suppliers who have a relationship with JEALSA and its entire value chain.

Human Rights. In accordance with the provisions of our Code of Ethics and Conduct, it is an essential requirement of this organization to respect internationally recognized human rights and as set forth in the International Charter of Human Rights, the principles related to rights included in the ILO Fundamental Conventions. Therefore, we demand that our suppliers take responsibility for respecting human rights, preventing their activities from having a negative impact thereon.


PRINCIPLES OF ENVIRONMENTAL RESPONSIBILITY

Environmental Policies. Our suppliers shall have policies that include preventive and corrective measures in order to ensure compliance with all environmental obligations that are required under legislation, where applicable.

4. COMMITMENTS IN MATTERS OF SUSTAINABILITY

JEALSA shows a clear commitment to sustainability, focusing on caring for biodiversity, respect for obtaining raw materials, and, especially, the use of natural resources, as well as the promotion of sustainable development in our supply chain.

To this end, JEALSA, in token of the assumption of responsibility for sustainability, is a member of organizations that are firmly committed to ensuring the balance between economic growth, environmental care, and social welfare, such as the ISSF (International Seafood Sustainability Foundation), which promotes science-based approaches to achieve long-term sustainability of global tuna populations and their ecosystem.

 JEALSA	Integrated Criminal and Anti-Bribery Compliance Management System (SIGCPAS)			
Title SUPPLIER AND PURCHASING POLICY	Code		MG-05	
	Version	02	Date	12/30/2021

Due to the various requirements that these organizations require that we set out in our policies, JEALSA's Supplier Code of Ethics will be approved in order to develop the values of the group and serve as a guide for the performance of the administrators, professionals, and suppliers of the entity.

5. WHISTLEBLOWING CHANNEL AND DISCIPLINARY REGIME

As indicated in JEALSA's Code of Ethics and Conduct, an ethical channel (whistleblowing channel) has been created, managed by the Compliance Committee, in which queries about the application of the ethical code and other internal policies of the organization can be made, as well as reporting behaviors that contravene said rules.

Said channel is accessible through the following means established for such purpose, specifically:

- By ordinary mail to the address: CORPORACIÓN JEALSA, To the attention of the Ethics Committee, Calle Vimieiro, 20, Boiro, A Coruña 15939, Spain.
- By email: jealsa@canaletico.online


All the members of the organization or third parties related thereto are obliged to report any breach or behavior contrary to the principles and guidelines set out in this policy of which they are aware.

6. PUBLICITY AND TRAINING

The company shall ensure that this policy is adequately publicized among all the subjects bound by it, ensuring that it is known and assumed by all members of the organization and third parties to whom it is addressed.

It shall be signed by all employees and third parties that must implement it and will be incorporated as an annex to the new employment contracts for positions that carry out tasks or functions related to the selection of suppliers or purchasing procedures.

JEALSA undertakes to carry out specific training actions in this area to ensure that this policy is known and applied by all persons obliged to do so.

	Integrated Criminal and Anti-Bribery Compliance Management System (SIGCPAS)			
Title SUPPLIER AND PURCHASING POLICY	Code		MG-05	
	Version	02	Date	12/30/2021

7. VALIDITY AND REVIEW

This policy comes into force on the day of its approval by the Board of Directors of the Organization, and shall be effective until a new related policy is approved.

The Compliance Committee is obliged to periodically review this policy, as well as any possible breaches or omissions, in order to propose, where appropriate, the creation of modifications or additions to the same, in the context of continuous improvement that the culture of Compliance advocates.

Retaliation against those who have made use, in good faith, of the channels established to report possible irregularities shall not be permitted or tolerated.

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Version Control:

EDITION	DATE	NATURE OF THE EDITION
01	12/16/2019	Initial version.
02	12/30/2021	Review.