



2021

CONGALSA

Sustainability Report

www.congalsa.com



CONGALSA, S.L.

Polígono A Tomada, Parcels 13,14,15 -15940
Pobra do Caramiñal - A Coruña - Spain

If you have any questions about the content or data of
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Index

- 1. Message from the CEO** [p.4](#)
- 2. Main magnitudes of the year 2021** [p.6](#)
- 3. About Congalsa** [p.7](#)
 - [3.1 Chronology](#) [p.8](#)
 - [3.2 Governance](#) [p.9](#)
 - [3.3 Compliance system](#) [p.11](#)
 - [3.4 About report](#) [p.13](#)
 - [3.5 Stakeholders](#) [p.13](#)
- 4. Materiality 2021** [p.16](#)
 - [4.1 Impact on the 2030 Agenda](#) [p.19](#)
- 5. Environmental issues** [p.20](#)
 - [5.1 Environmental management of the supply of raw materials](#) [p.22](#)
 - [5.2 Water management](#) [p.24](#)
 - [5.3 Management of energy consumption](#) [p.24](#)
 - [5.4 Greenhouse gas emissions](#) [p.25](#)
 - [5.5 Circular economy and waste management](#) [p.26](#)
- 6. Human team** [p.28](#)
 - [6.1 Health and well-being of people](#) [p.29](#)
 - [6.2 Training and development](#) [p.30](#)
 - [6.3 Compensation and benefits](#) [p.30](#)
 - [6.4 Labor relations](#) [p.31](#)
 - [6.5 Diversity, inclusion and equality](#) [p.32](#)
- 7. Value chain** [p.33](#)
- 8. Clients** [p.37](#)
 - [8.1 Scientific committee](#) [p.38](#)
 - [8.2 Certified quality](#) [p.39](#)
 - [8.3 Innovation at customer service](#) [p.40](#)
- 9. Society** [p.42](#)
- 10. Economic information** [p.46](#)
- Annexes** [p.47](#)
 - [GRI certificate](#) [p.48](#)
 - [Index of Global Compact contents](#) [p.49](#)
 - [GRI content index](#) [p.50](#)

1. Message from the CEO

One more year we present you the summary of Congalsa's activity in our Sustainability Report. 2021 has been a year in which we have still seen the effects of the pandemic and how the global logistics situation has complicated normal operations. A little over a year has passed since we joined Sulpasteis, creating an even broader family, which has allowed us to reach new markets. Thanks to this, together we have been able to close the year by improving economic results despite the health crisis that has occurred (and which is still latent).

The turnover has amounted to 113 million euros during the 2021 financial year between the A Pobra do Caramiñal factory and the Sulpasteis plant, in Portugal; which represents an increase of 13% compared to the economic results of the previous year, 2020.

The aforementioned Covid crisis has generated a more than notable impact on all hospitality activity, as well as the distribution of products within the Horeca channel. **Despite this, at Congalsa we have been able to market up to 26,000 tons of our different types of product.**

Faced with these global challenges, at Congalsa we have focused our efforts on becoming a smarter business. We are immersed in a transformation that will lead us to new scenarios always hand in hand with a committed and innovative team. Because innovation is in all the

people who make up Congalsa, thanks to whom we can respond to current and future challenges.

If we are convinced of one thing, **it is that the combination of innovation and sustainability is the key to acting at this time.** Both place us in a more competitive and better prepared position. We understand that digitization is a fundamental pillar in the organization and that is why the Congals4.0 model seeks to be capable of greater adaptability to needs in order to speed up strategic decision-making and advance integration with the client, as well as to achieve an assignment more resource efficient.

On the other hand, sustainability accompanies all processes, all the decisions we make. It is the basis of our business: generating wealth and employment with the utmost respect for the environment and the communities in which we are present. All this through a value chain committed to shared values, reflected in our Code of Conduct. We must be satisfied with the work we have done during this complex year, in which we have



Luis Miguel Simarro Esplá

CEO of Congalsa



been adapting to the circumstances and which has allowed us to reach, despite everything, record figures. The effort and responsiveness of each and everyone is admirable.

At Congalsa we always work according to the highest standards in terms of quality, environment and social protection. We have been part of the EMAS registry for more than fifteen years, we have had a risk prevention system for 10 years and we are signatories of the Global Compact.

I take this opportunity to reaffirm our commitment to the initiative, supporting the Ten Principles of the Global Compact in the areas of human rights, labor rights, the environment and the fight against corruption.

Through this report we want to express our intention to support and implement these principles within the framework of our sphere of influence, as we have been doing and will continue in 2022.

I take this opportunity to thank the entire Congalsa team for their commitment shown throughout this last year. Together we have been able to secure our position as a leading company, consolidating a digital transformation and a commitment to sustainability that allow us to face the new year with optimism.

Luis Miguel Simarro Esplá.

CEO of Congalsa

COMMUNICATION
ON PROGRESS



This is our **Communication on Progress** in implementing the Ten Principles of the **United Nations Global Compact** and supporting broader UN goals.

We welcome feedback on its contents.

2. Main magnitudes of the year 2021



36

Presence in 36 international markets



450

Clients



26,000

Tons of products manufactured



13%

Increase in billing compared to 2020



388

People make up our team



67%

Women in staff



17,552

Hours of training



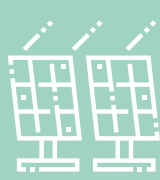
66,659

Euros in sponsorship initiatives



-9%

Reduction in water consumption



559MWh

Energy generated in our photovoltaic plants



95%

Purchasing seafood from sustainable sources



65%

Purchases from local suppliers

3. About Congalsa

iber[®]
COOK

LOW FROST

nowtural
bueno, sabroso y en bandeja

Congalsa is a company that has been working since 1990 in the production of fish-based products. After more than three decades of work, we can affirm that we have positioned ourselves as a benchmark in the ultra-frozen food manufacturing sector and a leader in culinary solutions for hotels and communities. The fish base in our products is still essential.

Our products are placed on the market through distribution brands or our own brands: Low Frost, Ibercook or Nowtural. **In 2021 we have been able to produce up to 26,000 tons of product** in a year still marked by restrictions, changes in demand and high demands on sanitary protocols in factories.

We share a vision: **to be a leading company in the international market, offering international food solutions, perceived as local in each market, continuously growing, solid, excellent in management and innovative.**

Values. As an organization we work around a common sense about how we carry out our work. We are convinced that the ethical and sustainable behavior of the organization is a consequence of the quality of the people who make up our team. From the beginning we defend important values for us and that we transfer to all the links and commitments established with our stakeholders.



Our purpose is to improve people's lives and for this we offer frozen and refrigerated foods that bring pleasure: sustainable, healthy and convenient, pursuing excellence and innovation and thinking of people.

Our values

- **Commitment to the company**
- **Respect for people**
- **Customer centric, both internal and client perspectives.**
- **Efficiency**
- **Integrity and business ethics**
- **Team work**
- **Orientation to continuous improvement**
- **Innovation**
- **Positive attitude**
- **Sustainability oriented and environmentally friendly.**

3.1 Chronology

The beginning

1990. Activity begins in Ribeira, with Congelados Barbanza factory on Calle Romero and Congalsa, in Deán Pequeno.

1995. Luis Miguel Simarro assumes the general management of Congalsa.

1998. Start-up of the first cold storage and first automatic cutting line.

2000. First decade of activity. Growth continues with the second cold storage.



2000-2010

2003. New installation in A Pobra do Caramiñal, intended for the manufacture of dough and turnovers.

2005. New precooked plant and installation of packaging robots.

2006. A year later, the facilities grow with a new plant for fish and shellfish preparations and central offices in A Pobra. This same year a cold storage is built and activated in Canary Islands.

2009. Construction of the pilot plant for the development of new products.

2010. Congalsa's 20th anniversary.

2011-2022

2013. Ibercook brand is born, specifically for the HORECA channel.

2014. The third cold storage is put into operation.

2015. Congalsa celebrates its 25th anniversary. Start-up of the gluten-free products plant.

2016. Launch of Ibercook Chef and Ibercook Natural.

2019. Creation of Nowtural and development of the product line with an ecological certificate. Start of activity in warehouse P19, in A Pobra.

2020. 30th anniversary. Corporación Congalsa incorporates a plant in Portugal and a new cold storage.

2021. The photovoltaics panels in the Canary Islands warehouse comes into operation.



In the image above, view of the main building and headquarters of Congalsa. In the lower image, aerial image of the Ribeira plant.

3.2 Governance

Congalsa's business culture and corporate governance model facilitate the correct management of the company, so that its value and its commitment to sustainability are maximized.

The governing bodies of the organization are made up of the Board of Directors and the Executive Committee, made up of fourteen people, responsible for managing the different departments of the company. The people who make up the Committee hold executive positions within the structure of the organization and have extensive experience in their different fields. To work on the strategy as

a company, and given the characteristics of Congalsa, the management team, through monthly and annual meetings, establishes the strategy, objectives and action guidelines that determine the management of the economic, environmental and social aspects of the organization.

Board of Directors

Luis Miguel Simarro
CEO

Julio Simarro
Sales & Marketing Director

Executive

1. **Luis Miguel Simarro**, CEO
2. **Julio Simarro**, Sales & Marketing Director
3. **Ricardo González**, Administrative and Financial Director
4. **Eric Larguet**, Technical Director
5. **Noemí Gil**, IT Director
6. **Juan Carlos Rama**, HR Director
7. **Isabel Cañas**, Public Relations Director
8. **Belén Sanmartín**, Food Safety, Quality and Environment Director
9. **Modesto Magariños**, Production Director
10. **Mónica Cascallar**, Innovation Director
11. **David Comesaña**, Purchasing Director
12. **Noela Prieto**, Continuous Improvement and Internal Organization Director
13. **Diego Álvarez**, Planning Director
14. **Luis Ángel López**, Corporate Controller

3.2 Governance

Our excellence in management led us to become the second company in the food sector to obtain the **EFQM 500+ certificate**, as a sign of our commitment to excellent, innovative and sustainable comprehensive management. Having an excellent management model translates into guiding the entire organization in the same direction, from the strategic planning process, the definition of key objectives and success factors, to the definition of dashboards for the control and monitoring of the project evolution. It has also consolidated a culture that seeks continuous improvement throughout the value chain, enhancing the effectiveness of collaboration and teamwork, with improvement initiatives, systematic meetings and fluid communication.

In 2021, the **Galician Atlas of the Committed Company** highlighted Congalsa as one of the 21 Galician companies that stand out for their commitment to good governance. The atlas assesses the business commitment of Galician companies in the environment such as good governance, the environment, the environment and people. Specifically, for the analysis of the "Good Governance" category, four variables were identified through which the company's commitment in this area can be evaluated, always with objective criteria. These variables are, in short, the ethical policy within the strategy of an organization, compliance with the sustainable development goals

contained in the UN Global Compact and active transparency, in terms of resources and people, and financial transparency.

Congalsa appears in the tenth position of a list that also analyzes parameters that make up the category of good governance such as ethical management and compliance with sustainable development objectives.

We were the second company in the food sector to obtain the EFQM 500+ certificate, as a sign of our commitment to excellent, innovative and sustainable comprehensive management.



Image of the second edition of the Galician Atlas of the Committed Company Galicia Smart Business 2021, in which Congalsa was highlighted among the top ten.



3.3 Compliance system

In line with our commitment to legal compliance, over recent years we have developed a **Criminal Risk Prevention System adapted to UNE 19601 on Criminal Compliance Management Systems and ISO 37001 on Anti-Bribery Management Systems.**

We have a Criminal Compliance Policy and an Anti-Corruption Policy that function as axes on which the Congalsa Criminal Compliance and Anti-Bribery Management System pivots, as well as various protocols, instructions and procedures aligned both with said policies and with regulations and standards of reference and that are fundamental to building a solid system.

Considering training as one of the basic pillars for the proper functioning of our system, **during the 2021 financial year it has been reinforced with the aim of achieving full awareness of the workforce in the culture of compliance and knowledge of our System, as well as as well as for knowledge by people and positions with more responsibility to criminal and bribery risks, of those specific risk situations to which they are exposed in the exercise of their functions within the company. Periodically, information and news on Compliance have been sent to the staff,**



in a simple and understandable code for their recipients, in order to familiarize all staff with this issue and achieve greater staff involvement.

In addition, we have opened our channel for complaints to third parties, in order to extend our culture of compliance to all the organizations and third parties with which we interact, and to have a tool that allows you to report irregular behavior or conduct of which you may be aware, thereby allowing said situations or behaviors to be investigated and consequently contributing to the minimization and control of the risks to which the organization is exposed.

We have also communicated our Code of Conduct and our main Policies to business partners, as well as their publication on the corporate website, in order to give our System the proper projection and ensure that our stakeholders align with our principles, norms and standards of application in these questions.

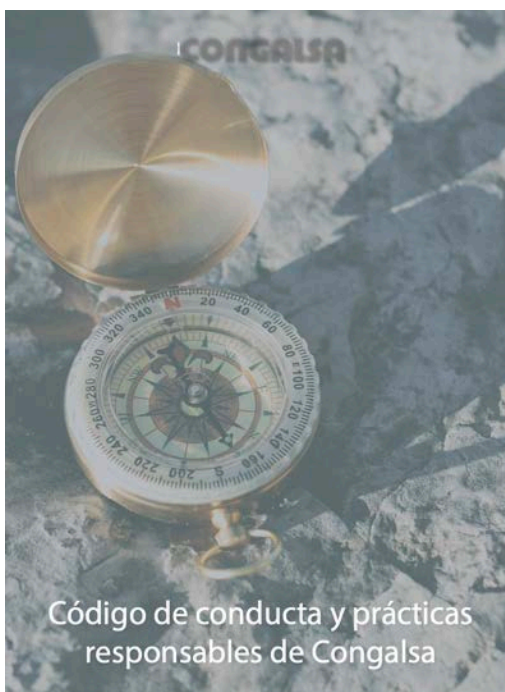
In 2021, training in Compliance has been reinforced with the aim of achieving full awareness of the workforce in the culture of compliance and knowledge of our System.

3.3 Compliance system

During the 2021 financial year, an exhaustive review and update of our map of criminal and anti-bribery risks has also been carried out, in order to verify its adaptation to the reality of the organization, carrying out a meticulous weighing of the existing controls and aimed at minimizing the criminal risks of Congalsa.

Likewise, a general review of our System has been carried out to verify its adaptation to the standards and to carry out those adjustments or improvements that are necessary and highlighted, always with the aim of achieving a prevention system that complies with the requirements established in criminal law and standards.

In accordance with the continuous improvement that presides over Congalsa's Compliance System, both from our Compliance Committee and from Senior Management, proposals and actions continue to be carried out aimed at the progressive optimization of our System, which is reinforced every year with the objective of achieving excellence and offering adequate and solid protection to the organization.



Our Code of Conduct and Responsible Practices exemplifies the set of rules and ways that identify and regulate our way of doing business.

Clicking on the image you can access it.

**Congalsa
supporting the
Global Compact**

FIGHT AGAINST CORRUPTION

"Principle 10: Businesses should work against corruption in all its forms, such as extortion and bribery"

At Congalsa we have a compliance system and we train our teams to fight against all forms of corruption and bribery.

3.4. About report

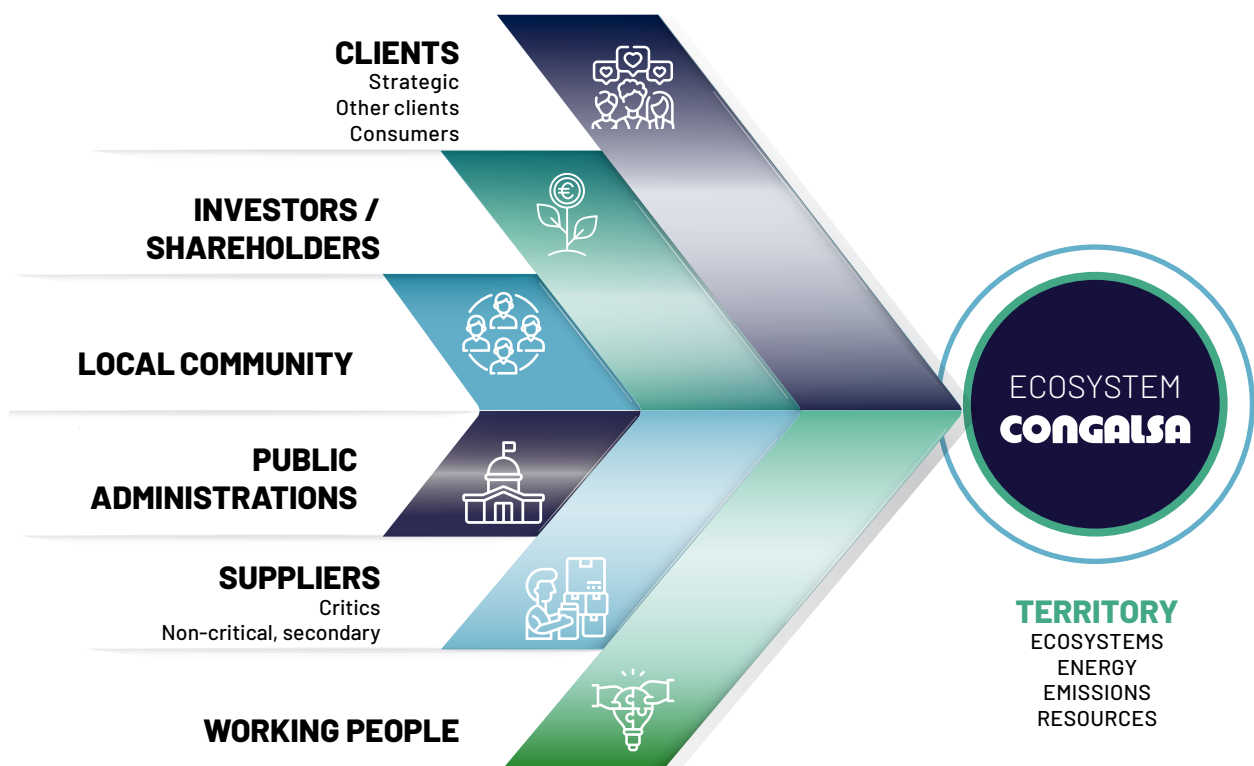
The period covered in this report corresponds to the year 2021. This report is the result of the joint work of a large number of professionals from various areas and follows the guidelines of the Guide for the preparation of sustainability reports of the Global Reporting Initiative GRI Standards, according to the "Exhaustive" option. Likewise, it responds to the principles of the United Nations Global Compact and indicates the **Sustainable Development Goals** to which we contribute with the actions described. To give greater consistency and credibility, the content of the report integrates the requirements demanded in the Communication on Progress (COP) Policy of the **Global Compact**.

3.5 Stakeholders

We maintain links and constant communication with our stakeholders. This way we can know their impressions, detect areas for improvement and opportunities that allow us to achieve business excellence.

From the analysis of our stakeholders, we work so that the action in terms of sustainability is aligned with the expectations of all of them. At the same time, this identification and prioritization of material issues serves to determine the contents of this Sustainability Report and Corporate Report. They reflect the significant economic, environmental and social impacts and those that substantially influence the assessments and decisions of our stakeholders.

We could not generate wealth in a sustainable way without a set of stakeholders like the one we have. Our ecosystem of people and organizations capable of generating value, who identify us and for whom we work seeking continuous improvement.



3.5 Stakeholders

INVESTORS / SHAREHOLDERS

Requirements

- Management of risks and opportunities that may affect an investment
- Economic and financial viability of the company
- Control and minimize the criminal and bribery risks of the organization
- Reduce penalties for legal breaches
- Absence of occupational accidents

Expectations

- Guarantee financial results
- Prestige and reputation.
- Strict compliance with environmental legislation
- General information (operational and corporate)
- Have a certified criminal compliance and anti-bribery system
- Communication channels
- Complaint channel
- Compliance Committee meetings
- Annual meeting
- Corporate web
- Social media
- Email
- Annual sustainability report

WORKING PEOPLE

Requirements

- Compliance with environmental requirements
- Compliance with labor regulations and prevention of occupational risks
- Guarantee the maximum safety and health conditions at work
- Promote a culture of regulatory compliance
- Respect for Human Rights

Expectations

- Substitution of hazardous substances by non-hazardous
- Specifications for the purchase of non-hazardous or reduced hazard products.
- Improvement of salary conditions
- Flexibility in schedules and conciliation measures
- Continuous training programs
- Promotion of professional and personal development
- Good working environment
- Assessment and recognition
- Security and health at work
- Communication channels
- Complaint channel
- Work environment survey
- Specific projects (people, Thursday InnCon)
- Sectoral Committees (safety and Health/Equality)
- Corporate web
- Social media
- Email
- Annual sustainability report

CLIENTS

Strategic / Other clients / Consumers

Requirements

- Less impacting products for the environment
- Commitment to the prevention of crimes in its relations with third parties, as well as the correct management of fraud and bribery
- Establishment of adequate communication channels to report inappropriate conduct

Expectations

- Development of Healthy, Sustainable, Convenient and Pleasant products, in which environmental criteria for packaging will also be taken into account
- Food safety
- Quality
- Price and conditions of sale
- Agile response to requests and claims
- Personalized attention
- Innovation
- Communication channels
- commercial catalog
- Customer Service
- Surveys and opinion panels
- Press releases
- Advertising campaigns and specific events
- Complaint channel
- Corporate web
- Social media
- Email
- Annual sustainability report

3.5 Stakeholders

PUBLIC ADMINISTRATION

Requirements

- Compliance with environmental legislation
- Transparency
- Commitment by the organization to the prevention of crimes in its relations with third parties, as well as the correct management of fraud and bribery
- Establishment of adequate communication channels to report inappropriate conduct

Expectations

- Strict compliance with environmental legislation
- Compliance with the commitments assumed voluntarily
- Sending the requested information
- Support in actions of local interest
- Improvement and involvement with the local community
- Employment generation
- Communication channels
- Complaint channel
- Corporate web
- Social media
- Email
- Annual sustainability report

SUPPLIERS

Critics /
Non-critical, secondary

Requirements

- Recognition of the good environmental behavior of its products
- Recognition of good environmental behavior of the organization
- Approval and contracting processes
- Compliance with contractual commitments
- Food safety
- Quality
- Introduction of specific compliance clauses in the contract and orders
- Adherence of critical Suppliers to the Compliance Policy, Code of Conduct and Anti-Corruption Policy

Expectations

- Taking into consideration the environmental behavior in the evaluation of suppliers/contractors
- Linking the commitment to responsibility and ethics
- Adherence to your compliance policies and procedures
- Lasting contractual relationship
- Communication channels
- Purchasing Managers
- Supplier approval system
- Supplier surveys
- Direct communication
- Face-to-face meetings and regular visits
- Complaint channel
- Corporate web
- Social media
- Email
- Annual sustainability report

LOCAL COMMUNITY

Requirements

- Recognition of good social behavior of the organization
- Commitment to the implementation of the Code of Conduct

Expectations

- Support in actions of local interest, contribution of resources
- Respect for the environment and the natural environment
- Improvement and involvement with the local community
- Employment generation
- Communication channels
- Heads of external relations
- Community survey (biennial)
- Direct communication, person to person
- Meetings and visits
- Social media
- Email
- Sustainability report
- Press releases

4. Materiality 2021

Materiality is the result of the evaluation of the demands and expectations of Congalsa's internal and external stakeholders. It is a key concept not only for the report but also for the management of sustainability in an organization. To prepare a sustainability report according to the GRI Standards, it is necessary to apply the principle of materiality and the principle of inclusion of stakeholders. The **principle of materiality** establishes that the report must deal with issues that reflect the significant economic, environmental and social impacts of the organization, and that substantially influence the assessments and decisions of the stakeholders. In other words, the principle of materiality determines which are the topics and their respective indicators that the report must include and on which the company should focus for its management and information. The **principle of inclusion of stakeholders** establishes that the reporting organization must identify its stakeholders and explain how it has responded to their expectations and interests. The materiality analysis allows compliance with both principles.

All material issues for the sustainable performance of our organization are reflected in this report, as well as the indicators established in GRI and others that have been developed based on the characteristics of the organization and the expectations of our stakeholders. Likewise, in the final index of this document, the main SDGs related to the actions set out in the report are identified.

Thanks to the materiality analysis process, we identify the most relevant issues both for the organization and for all stakeholders. Through this process we can identify and prioritize those issues that are of most concern (material issues), in order to ensure that our actions are aligned with them. In this report we include information on the evolution and our response to these relevant issues.

1. IDENTIFICATION OF INTERLOCUTORS. We identify and characterize the entities and organizations with whom we maintain a link or generate an impact, identifying all the stakeholders that may be related or linked throughout the value chain and in the environment in which our activity takes place. To establish communication with each group and collect their impressions, each member of the Executive Committee is assigned an interest group.

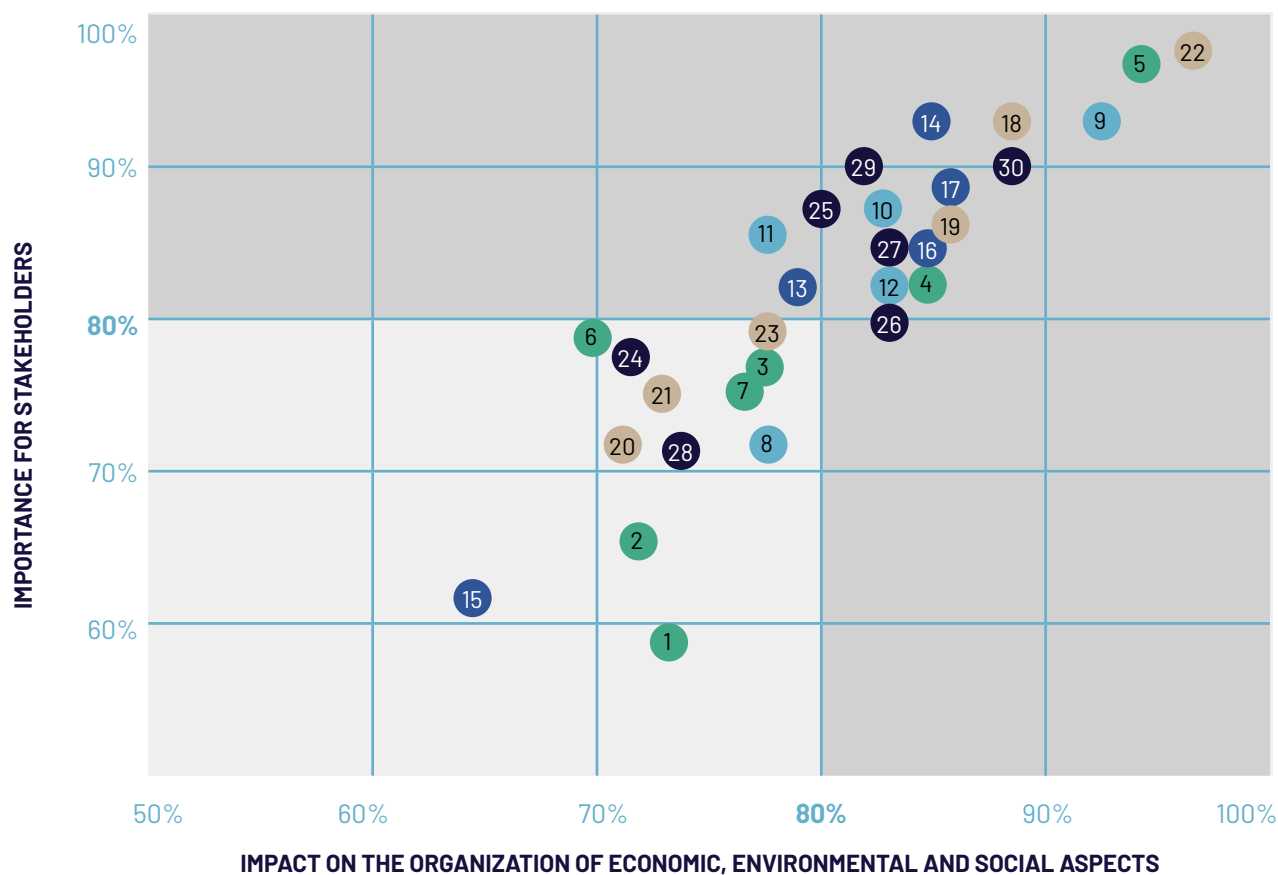
2. PRIORITIZATION OF ISSUES. When making decisions regarding the content of this report, the Expectations and reasonable interests of the different stakeholders have been taken into account through the consultations and contact maintained by each representative. In this way, the degree of priority that the different groups grant to the issues identified as potentially relevant for the organization is known. Both their relationship and the possible impacts that Congalsa's business model may have on them are taken into account. With all this information, topics are prioritized based on their materiality.

- **INTERNAL PERSPECTIVE:** importance of the economic, environmental and social impacts in decision making in Congalsa.

- **EXTERNAL PERSPECTIVE** (stakeholders): influence on the evaluations and decisions of the stakeholders.

3. VALIDATION. All previously identified material topics are evaluated in accordance with the principle of exhaustiveness. To ensure that materiality reflects Congalsa's performance in terms of sustainability in a reasonable and balanced manner, the results obtained have been analyzed and considered material according to the following materiality matrix.

4. Materiality 2021



Highlights those material issues with an impact and/or importance greater than 80%

ENVIRONMENT	SOCIETY
<ul style="list-style-type: none"> 1. Greenhouse Gas Emissions 2. Air quality 3. Power management 4. Water and wastewater management 5. Supply of raw materials 6. Management of waste and hazardous materials 7. Impacts on biodiversity 	<ul style="list-style-type: none"> 8. Community relations 9. Client welfare 10. Data security and customer privacy 11. Marketing and labeling 12. Healthy eating
PEOPLE	INNOVACIÓN Y MODELO DE NEGOCIO
<ul style="list-style-type: none"> 13. Labor relations 14. Health, safety and welfare of employees 15. Diversity and inclusion 16. Compensation and benefits 17. Training, development and education 	<ul style="list-style-type: none"> 18. Economic performance 19. Product Development 20. Environmental and social impacts on assets and operations 21. Product packaging 22. Product quality and safety 23. Internationalization
LIDERAZGO Y GOBERNABILIDAD	
<ul style="list-style-type: none"> 24. Systemic risk management 25. Safety and accident management 26. Business ethics and payment transparency 27. Competitive behavior 28. Regulations and political influence 29. Presence in the market 30. Supply Chain Management 	

4. Materiality 2021

As has identified, for each interest group there is a specific dialogue based on their characteristics and needs. Specific commitments and dialogue tools are defined. Despite this, there are two common elements in the relationship with all stakeholders: **continuous dialogue and transparency.**

The result is a materiality matrix that reflects 30 material issues represented based on their importance to stakeholders and their impact on the organization. The number of material issues has remained in line with the previous year, although some have changed their weight. **From this exercise, in 2021 the most relevant issues stand out as the quality and safety of the product together with the supply of raw materials.** Followed behind by issues related to customer welfare, economic performance and supply chain management.

In sixth place is the health, safety and well-being of employees and in seventh place is training, development and education. Both aspects directly affect the most important value of Congalsa, its human team.

Product development and compensation and benefits rank eighth, followed by customer data privacy and security. Ethics and transparency, competitive behavior, healthy eating, marketing and labeling, and labor relations complete the set of major material issues that have received the highest rating (greater than 8/10) in both impact and importance.

Product quality and safety

Supply of raw materials

Customer well-being

Economic performance

Supply chain management

Employee health, safety and well-being

Data security and customer privacy

Training, development and education

Product development

Compensation & Benefits

Water and waste management

Ethics and transparency of payments

Market presence

Competitive behavior

Healthy nutrition

Accident and safety management

Labor Relations

Marketing and labeling

From highest to lowest, the material issues for Congalsa in 2021. We structure and report on them in this Sustainability Report.

4.1 Impact on the 2030 Agenda

At Congalsa we contribute to the United Nations Sustainable Development Goals (SDGs) and to the compliance of the 2030 Agenda through our actions and through our commitment to social responsibility. **Congalsa contributes specifically to the objectives SDG 8, SDG 2, SDG 14, SDG 9, SDG 12 and SDG 3 as these are the ones in which it has the greatest impact and ability to influence through its business activity.**



End hunger, achieve food security and improved nutrition, and promote sustainable agriculture.

In addition to having a range of high-quality products at affordable prices, Congalsa collaborates with social entities in the local community to help reduce inequalities and hunger in people who need it.



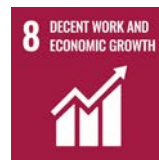
Guarantee a healthy life and promote well-being for all people at all ages.

At Congalsa we have a Scientific Committee that works to design healthier products, with optimal nutritional profiles and at the best price. In addition, we promote an organizational model that promotes the well-being of the workforce, committed to occupational health and safety as a fundamental value.



Conserve and sustainably use the oceans, seas and marine resources for sustainable development.

Congalsa works with suppliers under sustainable fishing criteria, guaranteeing the sustainable use of marine resources and minimizing the impact of catches on marine life.



Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all.

We consolidate stable and long-lasting employment relationships, both with the people who make up the workforce (reaching 85% fixed employment) and with suppliers and customers. All for the sake of guaranteeing stable economic development for the interested parties.



Guarantee consumption and production modalities that are as sustainable as possible.

We work to make our value chain as sustainable as possible: we do so with a comprehensive approach at all stages of production, improving economic, environmental and social criteria.



Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation.

We are committed to innovation applied under an industry 4.0 model: we have invested more than five million euros in a more modern, more sustainable and efficient industry in the consumption of resources.

5. Environmental issues

Reality makes environmental issues linked to sustainability more relevant than ever. It is no longer enough to reduce the environmental impact. At Congalsa we are aware of the need to regenerate the natural state of the territory and the marine environment. We are aware of the impact that issues related to climate change can have on the organization in the short, medium and long term. For this reason, **we have an environmental management system that centralizes the management of environmental issues in accordance with the ISO 14001:2015 and EMAS standards.** The environment department acts as a driving force for the coordination of these issues across the company with the collaboration of all the necessary departments. We have our own team to work on monitoring and evaluating the company's environmental objectives. In addition, this team is responsible for identifying the environmental risks associated with the company's activity throughout the value chain and managing them. Environmental risks

are identified through monitoring of the company's environmental indicators and participation in coalitions and collective initiatives for a more sustainable fishing industry.

Environmental policy. Understood as an extension of the Code of Conduct and Good Practices, it is a set of principles and rules that guide the actions of the entire company and the people that make it up (including third parties). **The Environmental Policy is explicitly committed to promoting fishing sustainability and respect for the Company's sustainability policy, through the use of responsible and planet-friendly processes or practices that avoid, control or minimize pollution and respect resources. marine.** Within the framework of the continuous improvement model that we develop, we work so that the products that we put on the market integrate this vision of fishing sustainability and meet the highest certification standards at the national level.



We have been working under the most demanding European standard in the field of environmental management, EMAS, for more than fifteen years. It is our opportunity to work in a more respectful way with the environment, transversally in all the areas of influence of the organization.

5. Environmental issues

We promote the transition towards a circular economy model in the broadest sense of the term through the reduction in waste generation, recycling and proper energy and water management. To this end, we are also committed to training our teams in environmental matters. All this allows us to work under strict manufacturing standards such as IFS HIGH LEVEL, BRC AA GRADE and the aforementioned EMAS and ISO 14001.

Derived from this Policy and in order to achieve continuous improvement of the Integrated Management System, we plan and carry out a series of investments that achieve an improvement in environmental impacts. For example, in 2021 we acquired a new breeding machine that reduces bread waste and new, more efficient equipment for container closure that reduces the need for adhesive consumption.

The actions that we apply in environmental matters have allowed us to meet the environmental objectives that we had set for the year: among others, avoiding the purchase of less than 10% of non-certified sustainable fish raw material and the reduction of 3% of organic waste in our factory P15.



2020-2021 investments	Investments planned 2021-2022
<ul style="list-style-type: none"> • Purchase of a new breeding machine that reduces bread waste • New metal detector in P14 • New equipment for closing boxes in P15 with reduction in glue consumption 	<ul style="list-style-type: none"> • New natural gas boiler in P15 • Artificial vision for different production lines in plots 14 and 15

5.1 Environmental management of the supply of raw materials

At Congalsa we work so that the raw material from the sea, our fundamental ingredient, comes from sustainable sources that are respectful of the environment and that guarantee the availability of fish in the future as well. **Since 2014, Congalsa has relied on the Sustainable Fisheries Partnership (SFP), the Marine Stewardship Council (MSC) and the Aquaculture Stewardship Council (ASC) when evaluating and controlling the risks associated with fishery and aquaculture products.** SFP is a non-profit organization, in charge of monitoring and helping to manage fishing reserves. This monitoring allows it to operate in a more sustainable manner, by offering products that meet the needs of Congalsa without putting at risk the regeneration capacity of the fisheries themselves. Thanks to SFP, there is a risk analysis that identifies the improvement needs of the fisheries from which Congalsa is supplied. With this information, it has been decided to go further in the commitment to fishing sustainability and social responsibility, becoming actively involved in improving those fisheries that are key to our line of business.

In this way, we not only supply ourselves with products that meet the fishing sustainability criteria and requirements, but we are also actively involved in improving those fisheries that do not currently meet them.

As an example, the attached graph shows the evolution of the risk rating of the fisheries with which we work in the last four years. What do we do for those most at risk? We look for alternatives that are capable of maintaining our supply commitments in terms of



quality and quantity without putting the regeneration of the fishery at risk.

For its part, the **Aquaculture Stewardship Council** is the certification program linked to the most responsible aquaculture farming practices that ensures that farms operate responsibly. The ASC standards are based on science-based criteria and best practices, including record keeping and monitoring of clear indicators for environmental and social performance. ASC conducts periodic reviews of each standard to ensure they are maintained and meet or exceed industry best practices. It is also responsible for making these responsible farming practices visible through the use of a logo for consumers, promoting the use of disclosure to business partners to create demand and market access for ASC-certified seafood. Like SFP, it works in collaboration with partners and other NGOs to increase demand for certified seafood through consumer purchasing preferences.

Working on these projects makes it possible to generate a specific alliance between fishermen, local authorities, research centers, the processing industry and retail chains, with the aim of favoring improvements in the policy and management of the species.

95% of purchases of seafood in Congalsa come from sustainable sources according to the SFP fish source database criteria.

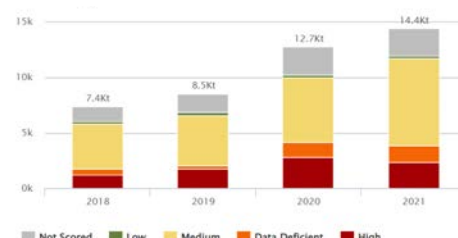


Figure 1. Comparison of the evolution of the risk for the fisheries with which we work in the last four years. Source: SFP. Own elaboration.

5.1 Environmental management of the supply of raw materials

Having the support of an entity such as SFP allows us to respond to the main material issue related to the environment, respect for biodiversity and the sustainable exploitation of raw materials.

A material aspect for Congalsa and on which it works proactively is the **fight against illegal, unreported and unregulated fishing (known by its acronym in English as IUU fishing)**. In 2021, the **Squid IUU Fishing Prevention Working Group** was formed, an initiative that emerged within the Global Squid Supply Chain Roundtable (Global Squid SR) promoted by SFP, and which brings together squid producers and suppliers with in order to promote improvements in the squid fisheries, both in management and at a political level. Various Spanish companies are present at this table, including Congalsa, along with other companies from the US, Australia, Canada and the United Kingdom. Together they join efforts to use their market power to reduce and eliminate illegal, unreported and unregulated fishing throughout the world in these species. The alliance covers species such as loligo or illex squid, as well as Pacific squid or giant squid. Being part of this industry-led initiative will lay the groundwork for impactful collective action against human rights abuses and illegal, unreported and unregulated fishing, processing and distribution worldwide of the squid.

The partner companies will work in contact with independent technicians to develop a joint work plan to address the challenge of IUU fishing and the human rights abuses linked to illegal practices. The purpose of the roadmap will be to eliminate raw material identified as high risk from the value chain and promote communication with customers and suppliers about their commitment to combat illegal squid fishing around the world, since although the countries of participants' origins already have programs to reduce IUU fishing, other areas of the world need additional education and support.



In 2021, for every ton of product we manufacture...



0.85 t
of raw materials consumed



0.027 t
of secondary materials consumed



0.43 m³
of water consumed



0.94 MWh
of energy consumed



0.097 t
de G.H.G. emitted



0.31 t
waste generated

5.2 Water management

In Congalsa, all the water needs (both in facilities and in the production process itself) are satisfied thanks to the supply from the municipal network. The water used in production is treated (in a physicochemical process by means of its own treatment plant) before it is discharged into the municipal sanitation network, in order to comply with legal parameters.

During the year 2021, the water supply stood at a total of 103,622 m³, from the municipal network.

Comparing the consumption for each ton of manufactured product, the ratio was lower than the previous year, standing at 0.43 m³/t production, 9% less than the previous year.

We have reduced water consumption for each ton of product manufactured by 9%

5.3 Management of energy consumption

We are aware that the challenge of climate change affects, directly and indirectly, all our operations; including the supply of raw materials from our suppliers. For this reason we strive to increase the energy efficiency of buildings and processes and to reduce carbon emissions.

In 2021, we have completed the installation of a photovoltaic panels in Canary Islands cool storage facilities. Thanks to this new photovoltaic solar energy generation system, **we have a total installed power capacity of 560kW**. Together, the three facilities generated a total of 559,256 kWh in 2021.

To understand the magnitude of the positive impact, it is estimated that among all the modules, the annual CO₂ is reduced by 111.8 tons.

Actions to increase energy efficiency.

At Congalsa we manufacture deep-frozen products, which makes us depend on a high energy expenditure for the production of cold, both in the manufacturing and production processes and in storage and distribution. Thanks to the installation of high energy efficiency and energy demand management systems, real-time information is obtained on both the overall operation of the installation and its individual compressors with real electrical and thermodynamic data. In this way, we are able to perceive deviations and anticipate malfunctions or problematic equipment before they completely fail.

To understand the magnitude of the positive impact, it is estimated that among all the modules, the annual CO₂ is reduced by 111.8 tons



In the image, photovoltaic panels installed in 2021 on the roof of the Canarias cold storage. On the next page, cover of the Congalsa headquarters, in Pobra do Caramiñal.

5.3 Management of energy consumption

We also have a cogeneration installation (in which the discharge gases from the refrigeration plant compressors pass through plates where the thermal inertia is used to heat the domestic hot water) and specific software, such as the virtual refrigerator,

thanks to the which we optimize energy performance to achieve maximum efficiency.

In 2021, our total electrical balance is a net consumption of 15,144.4 MW of electrical energy, 6,217 MW of natural gas and 31.8 thousand liters of gas oil for road transport. This places the energy consumption rate per ton of manufactured product at 0.94 MW/t in 2021.

In 2021, Congalsa received 64.7% of the electricity needed to carry out its activity from renewable sources. It has also reached a collaboration agreement with one of the leading companies in the electricity supply market to collaborate in the construction of a wind farm in Galicia that will supply 50% of the total energy.

5.4 Greenhouse gas emissions

In 2021, in line with the higher volume of product, the emissions associated with the consumption of natural gas have increased. On the other hand, the emissions associated with the fuel needed for the truck fleet and those associated with electricity consumption decreased, thanks to the supply based on renewable energies. **As a whole, the total emissions of Greenhouse Gases for each ton of manufactured product were 0.097 tCO₂eq/ t product.**

Congalsa received 64.7% of the electrical energy necessary for the development of its activity from renewable sources.

In addition, we are going to collaborate in the construction of a wind farm in Galicia that will supply 50% of our total energy.

Detail of CO₂ emissions in 2021

Scope	t CO ₂ eq.	% compared to 2020
Scope 1	1,216.84	- 62% in scope 2 emissions compared to the previous year
Scope 2	1,089.25	
Total	2,306.09	



5.5 Circular economy and waste management

As an industrial process, Congalsa generates a series of by-products and waste that are managed in accordance with the established legislation. In all cases, the waste generated is segregated by the staff themselves in order to facilitate their subsequent assessment. There are two categories of waste originating from the facilities:

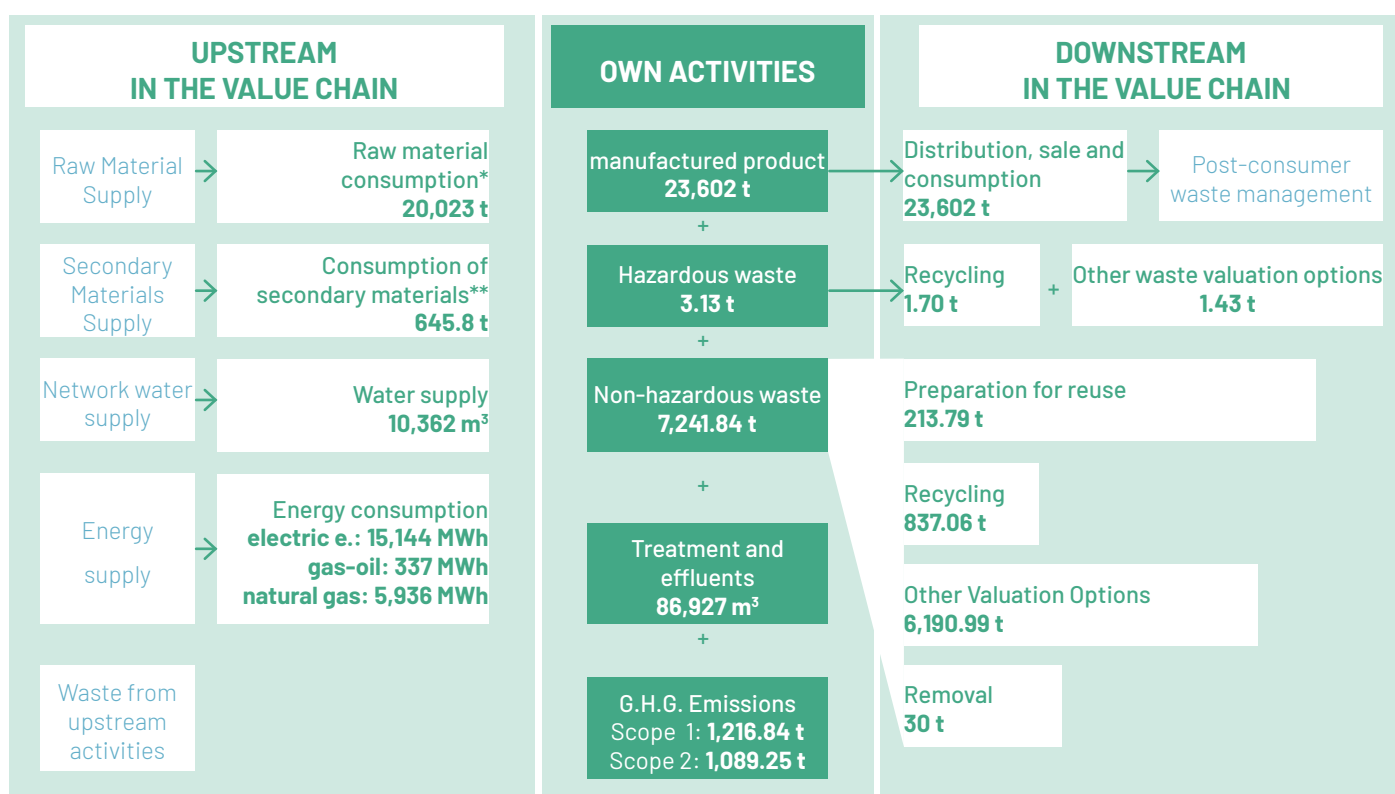
- Non-hazardous waste: mainly those derived from production, such as plastic and cardboard remains, sewage sludge or organic waste itself. In total, in 2021, 7,241.84 tons of this category of waste were generated.

- Hazardous waste: this category includes the waste derived from the maintenance and upkeep of all the machinery necessary for manufacturing and the facilities themselves. In this case, the level of generation is lower than with respect to non-hazardous waste. In 2021, a total of 3.13 tons of this category were generated.

In both cases, the management of both non-hazardous and hazardous waste has been carried out by managers authorized for these operations.

For the management of all our waste, both non-hazardous and hazardous, we have authorized managers.

FLOW DIAGRAM OF CONSUMPTION, EMISSIONS AND WASTE GENERATION IN THE VALUE CHAIN



Activities outside the scope of Congalsa

*Main raw materials: fish, cephalopods, bivalves, vegetables, flour and bread, margarine, eggs and oil, mainly.

**Secondary raw materials: cardboard and plastics necessary to manufacture the containers and packaging of the finished products.

5.5 Circular economy and waste management

Innovation for the circular economy.

Congalsa's innovation team works closely with the environment and quality team to develop new solutions in packaging materials with better environmental performance. To this end, we have a multidisciplinary team made up of people trained in chemistry, marine sciences, nutrition, chefs, computer science, chemical engineering, design and manufacturing, and industrial engineering to design the packaging of the future. A project to focus us as specialists in containers and packaging. This own project has been developing for more than 10 years. From the origin we work on the reduction of cardboard necessary to generate containers, thickness of plastics, etc. When a new packaging is developed, its life cycle is analyzed to see its behavior and anticipate how it will behave, trying to reduce its environmental impact. This means savings in part of the chain, and in the cost of the green point. We are currently working to manufacture containers that are 100% compostable, which is really complicated (due to the characteristics and shelf life of our deep-frozen products, they can exceed the shelf life of the container itself). In our Nowtural range we already comply with it and we continue working to make it possible in our entire assortment.



In our Ibercook Food Service line we have opted for a new 100% recyclable plastic with which we seek to reduce the environmental footprint of our products.

Congalsa supporting the Global Compact

MEDIO AMBIENTE

Principle 7: Businesses should support a precautionary approach to environmental challenges.

Principle 8: Companies should undertake initiatives to encourage greater environmental responsibility.

Principle 9: Businesses should promote the development and diffusion of environmentally friendly technologies.

At Congalsa we have a strict environmental policy and a mature environmental management system that allows us to meet the highest standards of compliance with environmental legislation and other voluntary commitments. For more than a decade we have been part of the European EMAS registry and we annually publish our Environmental Declaration, accessible and public on our website.

6. Human team

The year 2021 has been marked by a high demand for changes in order to adapt to the different situations arising from the management of the pandemic. This has had an impact on the teams, who have worked constantly to be able to offer a quality service and meet the objectives committed to with the client. The human resources policy at Congalsa has always maintained its values of health protection and promotion of healthy work environments. After 2020, this year has meant the consolidation of new habits, such as teleworking and the psychology service, along with the integration of new security measures in order to protect people's health.

Congalsa is an organization made up of 388 men and women who contribute their value to generate an honest and committed project. We are committed to setting up the best possible place to work, where people are recognized for their skills and contribute together to create a better community.

We form a diverse team in which professionals grow at the rate that our business does.

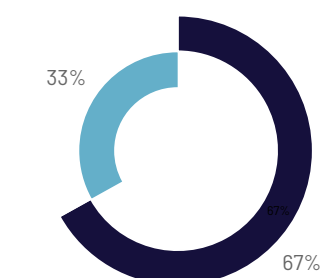
On the other hand, during the year 2021 the number of departures from the company was 60 people. It was due to a greater need for hiring due to specific hiring needs and the rest due to other reasons such as retirement, voluntary leave or leave of absence. In total, the company's turnover rate reached 3.65%, compared to 6.81% registered the previous year.

In 2021, the global rate of people with a permanent contract reached 73.4%





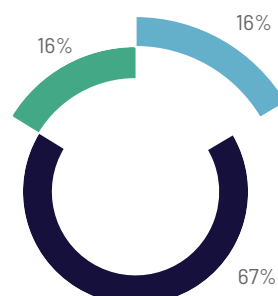
GENDER



Men: 128 people

Women: 260 people

AGE

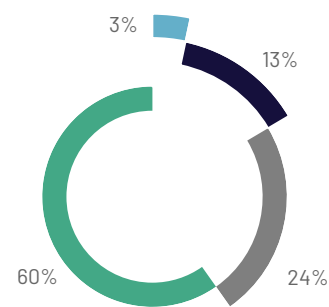


< 30 Years: 64 people

30-50 Years: 261 people

> 50 Years: 63 people

CATEGORY



Direction: 13 people

Controllers: 51 people

Employees: 92 people

Operators: 232 people

6.1. Health and well-being of people

The people who make up Congalsa are the most important value and for this reason policies are developed to guarantee the continuous improvement of their safety and health in the work environment. The main objective of the Safety, Health and Well-being Policy is to act to achieve the best level of health and to promote and consolidate good work habits. Occupational risk prevention management is established in the Prevention Plan and integrated into the company's general management system. The plan includes the commitment to provide a safe and healthy work environment, and defines the objectives and procedures to achieve it.

We have a management system in line with the ISO 45001 standard and its corresponding audit to guarantee its progress. As a measure to identify any risk, an external prevention service carries out risk assessments according to the job, installations and machines, as well as psychosocial aspects. With this, progress is made in the implementation of the most appropriate standard to provide safe and healthy workplaces, prevent injuries and deterioration of health and continuously improve in this important area.

At Congalsa we implement a comprehensive prevention program that is committed to the balance of well-being on a physical, psychological and emotional level. To this end, actions are launched aimed both at changing health habits (improving diet or promoting sports and physical exercise...) with actions aimed at disease prevention, such as our physiotherapy support service. Specifically, during 2021 no case of occupational disease has been reported.

We are characterized by being a diverse workforce, made up of committed women and men

occupational health and safety figures

	Number of days lost	Number of accidents		Absenteeism (%)
		with sick leave	without sick leave	
Women	1,367	10	3	3.42
Men	556	4	2	
Total	1,923	14	5	

6.2 Training and development

Investment in team training and development is a constant at Congalsa. The main objective is to progressively improve their level of qualification and professional development. The organization has an Annual Training Plan that detects the training needs of the different profiles, implementing programs aimed at improvement, training and the development of necessary skills in each case. **For the implementation of this Plan, during the year 2021 a total of 17,552 hours of training have been given, which represents 18% more hours on average per person.** Over the last year, training and development adapted to digital environments, added to the new post-Covid-19 scenario, have acquired fundamental relevance in the people management strategy, where training in a context of change and digitization is essential. Training has been offered in areas such as risk prevention in warehouse and logistics positions, languages, leadership and team management, handling of chemical products and environmental education, among others.

To develop talent, it is necessary to know the situation of each person within the team. This is the key to facilitating and promoting growth and development. For this reason, the entire team receives an annual performance evaluation as a way to improve professional development (360° evaluation).

6.3 Compensation and benefits

Congalsa has a set of social measures and improvements offered to all the people who make up our team, regardless of their working day or type of contract. To contribute to their well-being, we have a program of complementary social improvements that can be used by those who need it. These benefits include **childcare, laundry, auto repair shops, optics, dental care, or physical therapy. We favor the reconciliation of work and personal life to the maximum with a system of flexible hours and remote work adapted for those profiles that require it.**

In the aspects related to the management to avoid the salary gap, it is important to indicate that in Congalsa equal pay is an indisputable principle. The remuneration policy is based on objective assessment criteria that result in salary tables by position, guaranteed by Collective Agreement, applicable to all the people who work in the organization; under criteria of equality, parity and non-discrimination. **The salary level is linked to the position held by the person, never to the gender of the worker. Consequently, there is no percentage difference between the base salary of women and that of men in each employment category.**

Parental permission. As in the previous two years, 100% of the people entitled to parental leave availed themselves of it in 2021. In addition, 100% of those who availed themselves of this leave continued in the company one year after joining, the same as the figure recorded the previous year.

Training and qualification of people

	Women	Men
Direction	455 h	867 h
Controllers	2,619 h	2,300 h
Employees	4,200 h	2,918 h
Operators	2,882 h	1,311 h
Total	10,156 h	7,396 h

Maternity and paternity leave and reincorporation in 2021

Total number of people who have been entitled to parental leave	WOMEN	2
	MEN	5
Total number of people who have returned to work in the reporting period after ending parental leave	WOMEN	2
	MEN	5
Total number of people who have returned to work after ending parental leave and who were still employed 12 months after returning to work	WOMEN	2
	MEN	5

6.4 Labor relations

On a permanent basis, through the Health and Safety Committee, issues related to occupational safety and prevention are monitored, so as to guarantee the involvement of the people and their representatives in making decisions that affect this important question. The Committee is a joint body between representatives of the company and representatives of the Works Council. In 2021 it was made up of 4 people. Its parity composition between working people and the company allows decision-making based on co-governance; meeting on a quarterly regular basis in ordinary meeting and in extraordinary meeting every time an accident or incident of consideration occurs.

There are different channels to foster team cohesion and keep people constantly informed. One of the main avenues is One Page Report. A communication method that encompasses all the work teams and that integrates content also focused on meeting objectives and indicators.

This method of monitoring means that information is communicated orally from the higher categories to the lower ones; so that at all times people know the degree of progress in accordance with the objectives set, among other issues.



Congalsa
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LABOR

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: Businesses should advocate the elimination of all forms of forced or compulsory labor.

Principle 5: Businesses should advocate for the effective abolition of child labour.

Principle 6: Businesses should advocate the elimination of discrimination with respect to employment and occupation.

All our employees are covered by a Collective Bargaining Agreement, negotiated and approved by mutual agreement of all parties. Similarly, our Code of Conduct and responsible practices guarantees that no form of forced labor, use of child labor or discrimination is allowed. In addition, we have our own auditors to ensure that such commitments are met.



6.5 Diversity, inclusion and equality

The diversity in the governing bodies is reflected in the representation of women and men. In the year 2021 the Executive Committee is made up of 13 people (12 directors and 1 General Director), of which 5 were women and 8 men. Altogether, 259 women make up our team, reaching 67% female presence.

Equal treatment in all areas, as well as non-discrimination, is one of our inalienable principles. We guarantee equal treatment and opportunities for all the people who make up our team, customers and suppliers, rejecting any type of direct or indirect discrimination, regardless of age, gender, race, color, religion, sexual orientation, social status, marital status, nationality, political opinion, or family responsibilities. To this end, there is an Equality Plan and there is a body that watches over these issues and is responsible for monitoring compliance with it, the Permanent Equality Commission. The Plan incorporates a Harassment Protocol with an advisory team in charge of receiving any complaint in this regard.

Training for insertion. Within the framework of involvement with the community, Congalsa also collaborates in offering the knowledge acquired to favor the professional insertion of the people of the local community. For example, in 2021 we collaborated with the Integrated Employment Program of the Amigos association, in which our director of Human Resources at Congalsa, Juan Carlos Rama, explained what skills are needed to get and keep a job and what a person is looking for great company when it comes to recruiting employees. These training sessions complement the orientation and training actions that the students are receiving in said program, in which one hundred women participate to obtain a job opportunity.

In 2021, no case of discrimination has been received or detected; Therefore, no type of intervention was necessary.



In the image, our Human Resources director, Juan Carlos Rama, during one of the classes he provided in Ribeira.

Photo: Amigos

7. Value chain

2021 has been a complex year in many areas and especially in relation to value chain management. A clear imbalance has been seen in global supply chains, still marked by the impact caused by the pandemic. In addition, the rise in the price of raw materials (such as energy) and transport (especially in the case of maritime containers) have caused a complex situation that the Congalsa purchasing team has been able to manage. Even so, in the face of this adverse environment, management has been positive thanks to the robust management system, which has made it possible to orient itself favorably to changes since 2019. This changing context of 2021 entailed risks derived from increases in costs and risk in stock breakages, with what this would imply in terms of non-compliance with the commitments made to the customer. Thanks to the management of the entire team, it has been possible to manage forecasts in terms of raw materials: through a provision of reserves and optimized storage management, which

has translated into a reduction in the risk of not receiving raw materials and the fulfillment of the objectives. Despite the changes in production guidelines, the need to maintain quality levels and the ability to obtain raw materials in a fragile environment, at Congalsa we were able to end the year with figures of over 95% in meeting the targets set. A requirement that involved rapid changes in operations, reorganization of procedures and ways of working without breaking customer service at any time.

100% of purchases are made under production standards in accordance with ISO 9001, IFS, BRC, EMAS and OHSAS / ISO 45001 standards.

In addition, purchasing processes are being incorporated in accordance with SFP's responsible production criteria.

7. Value chain



Supply chain management. One of our responsibilities at Congalsa in supply chain management is the commitment to guarantee respect for the protection of human rights within our sphere of influence. It is the basis for working in line with the United Nations Guiding Principles on Business and Human Rights and Principle 1 of the Global Compact.

As a fundamental part of our commitment to sustainability, promoting the sustainable development of our supply chain is essential. For this reason, we consider it essential to place emphasis on establishing a responsible management of suppliers that considers environmental and social issues.

For this reason, one of the key principles of our policy is responsible purchasing: we offer our employees a definition of guidelines for making decisions regarding the purchase of products that not only meet technical or economic criteria, but also respect the environment, with current regulations in general, and especially with labor regulations and with the principles of transparency and prevention of corruption.

In Congalsa, the Purchasing department collaborates transversally with the RREE, ICT, quality departments and other departments involved in the selection

of new suppliers through an approval and verification process, to ensure that Congalsa's Requirements are met before the creation of the commercial link.

We prioritize the consolidation of relationships of trust with suppliers whose behavior models are consistent with our social responsibility commitments, reflected in our Code of Conduct, with the purpose of promoting and guaranteeing good practices from the labor, social and environmental point of view in the supply chain supply. The Code of Conduct and the Policy for suppliers are an essential requirement that must be complied with and are included in the commercial contract. We prioritize a relationship of trust with them, ensuring that they are aligned with our own commitments, thus contributing to ensuring the human rights of workers and strengthening the fishing industry globally.

As explained above, **we are part of the Illegal, Unreported and Unregulated (IUU) Squid Fishing Prevention Working Group**. Being present at this table makes it easier for us to collaborate to strengthen our value chain. The partner companies will work in contact with independent technicians to develop a joint work plan to address the challenge of IUU fishing and the human rights abuses linked to illegal practices.

Congalsa's sustainability policy is based on a purchasing strategy based on the values of sustainability and traceability and on initiatives that allow us to collaborate actively and intensely in the protection of marine resources.

7. Value chain

The purpose of the roadmap will be to eliminate raw material identified as high risk from the value chain and promote communication with customers and suppliers about their commitment to combat illegal squid fishing around the world, since although the countries of participants' origins already have programs to reduce IUU fishing, other areas of the world need additional education and support.

During 2021, due to the restrictions derived from the global socioeconomic context, it has not been possible to carry out 100% of the planned audit plan in person; therefore, some of them have been replaced by telematic audits. In any case, during the past year there have been no changes of suppliers in origins of risk. The usual procedure is

that our inspectors of origin ensure that the raw materials meet our regulations and standards before being shipped. We currently have inspectors at origin in Argentina, Uruguay, Chile, Peru, New Zealand, China, Vietnam, Thailand, Namibia, France and the Netherlands.

Thanks to this audit and monitoring work that we carry out in the supply chain, in addition to ensuring quality, we can guarantee that we do not accept or allow practices that are harmful to the environment, that involve questionable working conditions or the use of child labour.

All Congalsa suppliers are approved, complying with the legal, environmental and social criteria established in said approval process.

**Congalsa
supporting the
Global Compact**



HUMAN RIGHTS

Principle 1: We support and respect the protection of internationally declared human rights.

And we do it not only in our teams but throughout the value chain, with the Code of Conduct and Responsible Practices as the maximum guarantor.

Principle 2: Companies should ensure that they are not participants in human rights violations.

For this reason, all contractual relationships must comply with the provisions of the Code of Conduct, which ensures, among others, the protection of Human Rights.

7. Value chain

Sector collaboration. At a sectoral level, we are part of different groups and clusters that allow us to work in a network, better communication and continuous improvement in the opportunities of the industry. We believe that collaboration with other companies and organizations is an effective way to generate alliances that allow progress in a global market for more sustainable seafood.

In 2021, the effects of the restrictions were still evident, so numerous sectoral meetings continued to be held virtually. Despite this, we were present at two of the most important fairs in the sector: Conxemar, which could be held in person, and Clusaga, virtually.

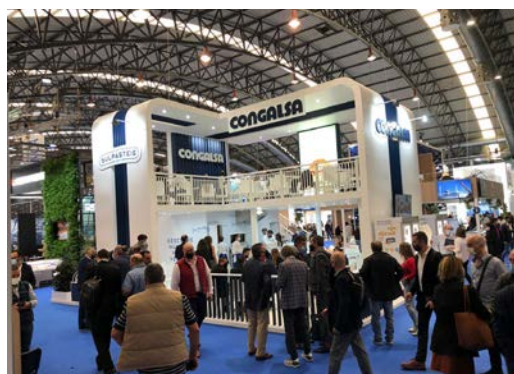
In the case of Conxemar, we focus our presence on sustainability as a fundamental element of our strategy, both in the design and in the launch of new products. Transitioning towards a Circular Economy model is a great challenge that we at Congalsa tackle with enthusiasm, implementing improvements and setting ourselves goals that help us travel this path.

We are part of:

- Association of Cold Storage, Logistics and Distribution of Spain (ALDEFE)
- Spanish Association of Manufacturers of Prepared Meals (ASEFAPRE)
- Spanish Association of Wholesalers, Importers, Transformers and Exporters of Fishery and Aquaculture Products (CONXEMAR)
- Galician food cluster (CLUSAGA)
- Galician Entrepreneurs Confederation (CEG)
- Spanish fishing interprofessional (INTERFISH SPAIN)
- Urban planning entity for the conservation of the industrial estate "A Tomada"

We are also associated with:

- Galician Association of Family Businesses (AGEF)
- Galician Health Cluster (CSG)
- National Association of Canned Fish Manufacturers (ANFACO)
- Financial Club of Santiago (CFS)
- Association for the Advancement of Management (APD)
- Spanish Association of Managers (AED)
- Pobra do Caramiñal Entrepreneurs Association
- Ribeira Entrepreneurs Association



*In the left image, Congalsa stand at the Conxemar fair.
On the right, participation in the event of the Galician Food Cluster*

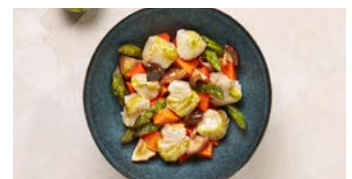


8. Clients

We currently have more than 450 clients in 36 countries on four continents to whom we offer a permanently renewed offer. At Congalsa we manufacture products for both large distribution and the restaurant and hotel industry. We do it under the distribution brands and as Ibercook and Low Frost. In addition, in 2021 we have consolidated Nowtural: a range of products made with fish cataloged with the MSC blue seal, which guarantees that its fish ingredients come from sustainable fisheries and ensures its traceability from the ocean to the plate.

In 2021 we have launched nine new products from our Ibercook line and six products from the Nowtural range. The latter stand out for being 100% natural and balanced dishes made with fish from certified sustainable fisheries.

- COD WITH CHICKPEAS, ZUCCHINI AND RED MOJO: a ready-made dish with a high protein content
- SALMON CURRY WITH SOFT WHEAT AND PEAS: environmentally friendly packaging, high in protein and Omega-3 fatty acids
- HAKE WITH SWEET POTATOES, MUSHROOMS AND WHEAT WITH GREEN MOJO: high in protein, potassium and low in saturated fat.
- SALMON QUINOA AND PUMPKIN BURGUISH: high in protein and low in saturated fat
- HAKE, WAKAME AND SHITAKE BURGUISH: low in saturated fat and a source of potassium
- POULTRY, CHICKPEA AND CAJUN TOUCH BURGUISH: provides phosphorus, protein, iodine, and is gluten-free.



With Nowtural we provide a line inspired by the principles of sustainability, convenience and 100% natural and balanced recipes, with fish as the protagonist.

8. Clients

2021 was the year in which we decided to launch our first two references on the market made with ingredients from organic farming (endorsed by the seal of the Regulatory Council for Organic Agriculture of Galicia (Craega). These are vegetable spring rolls and the oven-safe organic mushroom and aubergine dumplings. Both references expand the range of those already in existence, such as chicken curry rolls or dumplings with Tex-Mex meat or chicken fillings. These new organic products have been subjected to the traceability and control required by European regulations, in addition to being endorsed by the Craega. In this way we guarantee the origin of the ingredients used and make it easier for the consumer to identify the organic

product in the conventional channel. Both products reflect our commitment to continue to innovate in the category of deep-frozen prepared foods, providing a greater variety of products at a time of growing concern for well-being, health and the environment.

Also, during the Conxemar fair we present novelties for the hotel industry through new proposals for tapas based on fish, and main dishes such as breaded blue whiting fillets and three cuts of European hake, adapted to the needs of today's restaurants.



8.1 Scientific committee

At Congalsa we adopt a policy of offering, above all, healthy products. To do this, we have a scientific committee, made up of people who are experts in nutrition who, together with people from Congalsa's R&D and Quality departments, design new product ranges and improve the formulation of current ones to offer a more diverse catalog and balanced.

The main lines of work and analysis that focus the sessions of the Congalsa scientific committee are:

- **Determine the appropriate measures to guarantee health protection and propose alternatives with full food guarantees.**
- **Participation, from the beginning, in the development of products with high nutritional value.**
- **Implementation of the Strategy for Nutrition, Physical Activity and Obesity Prevention (NAOS Strategy) , focused on promoting a balanced diet and healthy lifestyles.**
- **Development of products adapted to specific nutritional needs.**
- **Identify and evaluate trends in present and future nutrition.**
- **Evaluate, in accordance with the food safety policies determined by the EU, the risks arising from the use of certain ingredients.**



8.1 Scientific committee

The Scientific Committee of Congalsa is composed of:

- Dr. **Jesús Román**, President of the Scientific Committee of the Spanish Society of Dietetics and Food Sciences.
- **Belén Sanmartín**, Director of Quality, Food Safety and the Environment at Congalsa.
- Dr. **Gaspar Ros**, Professor of Nutrition and Bromatology at the University of Murcia
- **David Comesaña**, graduate in Marine Sciences and Purchasing Director of Congalsa
- **Eric Larguet**, Agricultural Engineer and Technical Director of Congalsa.
- **Mónica Cascallar**, Industrial Engineer and Director of Innovation at Congalsa.

The Scientific Committee has continued to develop alternatives to reduce fat with baked products and in new specific needs, such as gluten-free products.



8.2 Certified quality

We rely on standards of recognized prestige as a way of guaranteeing maximum quality and satisfaction, thinking of both the client and the final consumer.

• **IFS Higher Level:** food safety standard recognized by the Global Food Safety Initiative to audit companies that manufacture food. It is focused on the safety and food quality of processed products.

• **BRC AA Grade:** standard that helps distributors to comply with legal food safety obligations, guaranteeing the highest level of consumer protection. From the audit, we can identify the critical points in the production processes and in the supply chain, taking measures to reduce them.

In both standard approval processes, Congalsa obtains the highest level of assessment. These are reference systems that ensure compliance with food safety and quality standards. In addition to Congalsa's own manufacturing, 100% of the production volume manufactured by a third party is approved according to internationally recognized food safety management system standards.

In line with our implemented quality system, we respond to all complaints or claims that may arise. In 2021, a total of 120 complaints and/or claims were received from customers. In no case did these complaints pose a risk to the health or safety of customers or consumers.



100% of Congalsa products comply with the strictest food safety controls; according to both certifications.

8.3 Innovation at customer service

At Congalsa we believe in creativity and innovation. We do not hesitate to use them as tools through which to generate greater value and better results.

Congals4.0

Since 2019, the Congals4.0 project has been underway, developed thanks to the support of the Second Vice Presidency and the Ministry of Economy and Industry of the Xunta de Galicia. This project seeks to value an industrial 4.0 model that is totally new in the sector. The main objective of the project is to undertake a process of continuous reorientation of the entire organization towards the smart factory through comprehensive digitization. An effective model of digital relationship in each of the points of contact of the Congalsa experience and its integration with the client and the quality that is increasingly demanded. Our 4.0 industrial model emphasizes artificial vision as an integrated technology in our company and also on digitization, cybersecurity, blockchain, machine learning, artificial intelligence, process automation, virtual reality and augmented reality. It is a project framed within the Future Industries Program 4.0 – Smart Factory, co-financed with ERDF funds from the EU and which will run until 2022.

In 2021 we held the first dissemination event of the Congals4.0 project. In this presentation, in online format, we were supported by the director of Gain, Patricia Argerey, our colleague from Gradiant Luis Pérez-Freire, and our general director Luis Miguel Simarro; and in person with Mónica Cascallar

Latorre, director of innovation, and Daniel García Coego, head of industry at Gradiant.

Jueves InnCon

In another area, we continue to carry out the innovation bulletins and the Thursday InnCon sessions. These are internal work sessions, open to the participation of all working people, thanks to which we bring out all the ideas and proposals that allow us to advance in more innovative and disruptive products and processes. This year they have been focused on a technology, something unknown but that is coming with great force: augmented reality and virtual reality. We have focused on solving questions such as the characteristics of and significant differences between the two, advantages and disadvantages, what is being done in the world and how we can apply it in the industrial,

The innovation and creativity of those who make up Congalsa is a key tool in the present and future of the company.



In the image above, presentation of the Congals4.0 project. At the bottom, participation in the 5th APD-AGEF Directors' Forum with the Association for Management Progress.



8.3 Innovation at customer service

production and marketing sectors. The work of innovation is not only developed internally, we have participated in different events and conferences, both online and face-to-face, to contribute our grain of sand in the vision of digital transformation.

Innovation days

Our Innovation Director, Mónica Cascallar, attended the APD-Competitiveness and digitization #Digital Transformation forum, the Galician Entrepreneurs Circle to participate in the Conference "Food Sector: Strategic Issues for the Future of Galicia, Spain and the World", and the V APD-AGEF Forum of Directors with the Association for the Advancement of Management, sponsored by KPMG and Banco Santander, discussing economic recovery, business purpose and digitization.

This work is also complemented by the participation that we continue to carry out within the Business Factory Food accelerator, promoted by Igape, Gain, XesGalicia and Clusaga. Since 2021, Congalsa has been part of the Technological Demand Commission of DIHGIGAL; association for the digitization of the Galician Industry, in an intersectoral format that will work around a common challenge: to place the companies of the Galician industrial system in a position of competitive leadership at a global level through innovation and digital transformation, developing differential capacities and generating opportunities in collaboration with the ecosystem.



From left to right and from top to bottom: participation of our Director of Innovation in the #TresMASuno interview about the current and future state of the food value chain; representatives of the companies and entities integrated in DIHGIGAL (photo: CEAGA), award for innovation in Mindtech 2021 and act of the Circle of Entrepreneurs.

9. Society

We are not satisfied with generating quality employment. We want to be an active part of the communities in which we are located and have a positive impact on people's livelihoods. We want to contribute to the promotion of more inclusive and prosperous local economies.

People Project

An internal initiative with which we want to take advantage of the potential and positive attitude in the organization through activities open to the entire organization and in which we collaborate with other entities in our community. Thanks to the People project, we strengthen the feeling of belonging while promoting interesting initiatives. During 2021 we have developed:

- **Solidarity campaigns for the collection of food and toys, in collaboration with Cáritas Puebla.** The solidarity collection of toys was organized for the benefit of ICE Renovación, which

cares for needy families in Ribeira and the surrounding area.

- **Cooking recipe contest,** in collaboration with chefs Kike Piñeiro and Eloy Cancela from A Horta do Obradoiro Restaurant.
- **We collaborate with Ambar on Women's Day.**
- **We gave two environmental education workshops for Environment Day,** which were also attended by people from the Ambar and Amigos associations.
- We participate as volunteers in the organization and also as members of the **Andaina pola Diversidade, organized by Ambar.**
- We organized the **VI Andaina Solidaria Congalsa,** for the benefit of Cáritas Puebla, Cáritas Ribeira and Voluntary Bombeiros of Arganil.
- We organize the **V Photography Contest.** This year under the Sports theme for being an Olympic year.

In 2021, 65% of all our spending was allocated to local suppliers, a name under which we group those purchases that come from companies located in national territory.

9. Society

- We offered all the Congalsa teams **two sessions on healthy eating**, in collaboration with the nutritionist Lidia Folgar. In addition, two fruit baskets were raffled and new healthy references were introduced in the vending machines of the company's canteens.
- We organized the **IV Christmas Postcard Contest**, with the usual categories so that workers and families can participate.

In addition, throughout the year, we also manage the suggestion boxes by putting the answers on the digital screens in the dining rooms on all floors. In 2021, the Congalsa APP celebrates its first year of operation with good reception and continuous improvement of its functionalities.

Relationships with the community.

Our social initiatives allow for lasting partnerships with organizations that help create sustainable and positive social change in the community. The External Relations department is in charge of maintaining dialogue and active listening with the interest group that represents the public administration and the Society as a whole. Both local and regional administrations are represented in this group, as well as organizations from the local, regional and national associative fabric, sports entities, representatives of NGOs and charitable entities, educational centers and representatives of the media. On a biennial basis, we prepare a survey to learn about your concerns, needs and expectations.



On the left, poster of the virtual edition of the solidarity Andaina of Congalsa. On the right, delivery of the toys collected during the 2021 Christmas campaign.

9. Society

Consultations with our environment

In the last edition of 2020, 99 responses were obtained, with a total average rating of the survey of 9.5 (in the previous edition it was 9.5). An update of the survey will be carried out during fiscal year 2022.

In 2021, we have donated 66,659 euros in a total of 133 acts and 81 activities that have had the assistance or collaboration of Congalsa, grouped into different categories:

A. Institutional relations: among others, we participated in the conference on investment challenges and prospects in Galicia for 2021, talking about the keys to recovery (organized by the Galician Entrepreneurs Circle), meetings with IGAPE on European funds, meetings with the different sectoral associations in which we are present, we participated with SFP in the round table on the

international squid market (in Peru), the 12th cold logistics conference, we organized healthy talks, we participated in the business meeting of the strategic food sector for the future of Galicia, Spain and the World, etc.

B. Promotion of culture and sport: among the 81 collaborations in this field, we can highlight the collaboration with Cáritas Puebla, Cáritas Ribeira and Cáritas Canarias, with the Las Palmas Red Cross, the Spanish Association golf tournament against Cancer, Food Bank of Coruña, we donate food to the Red Cupboard, lots of food for the El Canario solidarity race, to the Society Hijos de Palmeira, the campaign to support local businesses in Puebla, the Palmeira Retirees Association, the Sons of Palmeira, Club de Teakondo Malaima or the NGO Ice Renovación.

From top to bottom, food donation to Cáritas, Down Coruña collaboration with Andaina, Andaina team, awards ceremony for the Congalsa Golf Tournament and, on the left, delivery of trophies for the Congalsa Regatta.



9. Society

C. Dissemination of knowledge: we have participated in different forums and specific conferences aimed at sharing our experience and knowledge in different subjects. Among others, we participated in the family business talk in the classrooms, a presentation at the University of Barcelona, presentation of the Concello de Boiro training project, speakers at the innovation breakfasts of the packaging cluster, webinar on new developments in compliance certification, APD conference on competitiveness and digitization, cybersecurity management for industrial companies, etc.

D. Awards and recognitions: in total we have received 7 distinctions, among which we highlight the recognition of the Galician Atlas of the committed company (Digital Economy), the distinction with the Ardán Well Managed Company Indicator and the Mindtech award for its project in connected industry and for leading industry 4.0 in the Galician food sector, developing a smart factory model that allows digitization, data analysis, cybersecurity and eco-sustainability.

Ramón Doval Award 2021. One of the aspects that we emphasize at Congalsa is the human factor. For this reason, each year we carry out the Ramón Doval Award for the values of the year. This is an award that we give to one of our workers through internal voting. This award bears the name of the previous director of external relations, who retired a few years ago, and is a recognition of the person who best represents the corporate values.

The contest has reached its ninth edition. In 2021, it was handed over to José Luis Romero García (Lucho), an operator in the maintenance area on plot number 13. At Lucho, the values that best represent us are made visible, such as commitment to the company, respect for colleagues, guidance customer, efficiency, integrity and business ethics and teamwork, among others.

In this ninth delivery of the Ramón Doval Award, Luis Miguel and Julio Simarro (general director and commercial director of the company, respectively) were present.

As a result of this intense activity in the organization, Congalsa has had a total of 296 appearances in the media throughout the year. A result of the work to spread and explain our way of doing business, focused on people, innovation and sustainability.



On the left, a training session on environmental education on the occasion of World Environment Day. On the right, delivery of the Ramón Doval Award to José Luis Romero García, accompanied by Luis Miguel and Julio Simarro

10. Economic information

In 2021 we have reached a turnover of 103 million euros.

In 2021, Congalsa's economic performance evolved positively, even though it was still conditioned by the impact of the pandemic caused by covid-19, with changes in consumption patterns that affected sales in the Horeca channel and changes in availability and price of raw materials, transport conditions and logistics operations.

Despite the social and health situation, Congalsa kept its plants operational throughout the year. This was possible thanks to the design of strict safety protocols and the commitment of all the people who work in the factories, who continued to go to their jobs in person.

Thanks to their work, the results of the Congalsa company reached a turnover of 103 million euros during 2021. In total, Congalsa sold 26,000 tons of its different product ranges last year.

Grants. The project "Design and development of an industrial model 4.0 in the Galician food sector" had the financial support of the Galician Innovation Agency, co-financed from the Feder funds and with the support of the Ministry of Economy, Employment and Industry, with the beneficiary entities being Congalsa and Gradiant (Technological Telecommunications Center of Galicia). To finance the Congals4.0 project, a total of 4.8 million euros have been mobilized in the 2019-2022 period, of which the company has allocated a grant of 1.6 million euros to, fundamentally, develop a digital twin from the factory.

	Euros
Generated Economic Value	103,691,388.55
Operating expenses	88,628,707.96
Wages and salaries	11,212,206.84
capital providers	2,182,003.82
Payments to administrations	765,027.42
Investments in the community	66,799.79
Total	102,854,745.83
Retained Economic Value	836,642.72



Annexes

This report has been prepared in accordance with the GRI Sustainability Reporting Standards (GRI), in accordance with the comprehensive compliance option.

Congalsa has adhered to the United Nations Global Compact since 2018. The GRI Index of this report, which also has the function of the Progress Report, indicates the different parts of the document that are related to each of the Principles of the Global Pact.

The following reporting principles included in the GRI 101 standard: Foundations have been used to establish the content of this document:

Inclusion of stakeholders

It identifies and maintains a constant dialogue with its stakeholders in order to subsequently describe how it responds to their expectations and interests.

Sustainability context

The objective of our report is to present Congalsa's performance against the concept of sustainability in its broadest sense. This implies examining performance in the context of the limits and demands placed on economic, environmental or social resources, at the sectoral, local, regional or international level. Also in how it contributes, or intends to contribute in the future, to the improvement of sustainability trends and advances in the different scales in which we are present. In this sense, when presenting information on issues with a local impact, it is important to provide information on how we try to influence communities through the generation of economic and social, employment, cultural or sports value.

Materiality

This report provides an account of those aspects and indicators that reflect the most significant social, environmental and economic impacts of the organization or those that could exert a substantial influence on the evaluations and decisions of its stakeholders.

Completeness

The coverage of the material issues and the definition of the coverage of the information must be sufficient to reflect the significant social, economic and environmental impacts and to allow the stakeholders to evaluate the performance of Congalsa during the year. We understand the principle of exhaustiveness when referring to information collection practices, which we systematize to ensure that the data collected includes the results of all actions where an impact is produced. And also understood as a way of presenting reasonable and adequate information. Based on the foregoing, we believe that the topics discussed in this report are sufficient to reflect the significant economic, environmental and/or social impacts and to allow stakeholders to assess our performance for themselves.

GRI certificate



Bureau Veritas Certification



Bureau Veritas Certification

Declara que se ha efectuado la verificación de la

Memoria de Sostenibilidad 2021

En lo que respecta a su estructura, contenido y fuentes de información de

CONGALSA S.L.

Como resultado de este proceso de verificación **Bureau Veritas Certification** expresa que

- El contenido de la información está basado y soportado por datos y registros comprobados como ciertos. Asimismo la información, su tratamiento, los cálculos, gráficos, etc., han sido oportunamente comprobados y verificados.
- La trazabilidad y relevancia entre información de base y contenido de la memoria es adecuada.
- Es conforme con los requisitos y principios establecidos en la Guía para elaboración de Memorias de Sostenibilidad en su versión SRS, elaborada por Global Reporting Initiative (GRI).

Conforme a esto **Bureau Veritas Certification** establece, para la Memoria de sostenibilidad 2021 de Congalsa S.L. la calificación/opción **exhaustiva**

Fecha de emisión a 22 de mayo de 2022

Fdo: Jorge Luis Cuyás Álvarez
Verificador Jefe
Responsabilidad Social Corporativa
Bureau Veritas Certification

Index of Global Compact contents

	Principle	Correspondence content
HUMAN RIGHTS		
1	"Companies must support and respect the protection of internationally recognized fundamental human rights within their sphere of influence"	Message from the CEO (p. 4) Mission, Vision and Values (p. 7) Compliance system (page 11, 12) Value chain (p. 35)
2	"Companies must ensure that their companies are not complicit in the violation of Human Rights"	Compliance system (page 11, 12) Value chain (p. 35)
PRÁCTICAS LABORALES		
3	"Companies must support freedom of association and the effective recognition of the right to collective bargaining"	
4	"Businesses should support the elimination of all forms of forced or coerced labour"	Compliance system (page 11, 12) Human Team section (pages 28-32)
5	"Companies should support the eradication of child labor"	Value chain (p. 33-35)
6	"Companies must support the abolition of discriminatory practices in employment and occupation"	
ENVIRONMENT		
7	"Companies must maintain a preventive approach towards the environment"	
8	"Companies should encourage initiatives that promote greater environmental responsibility"	Section 5. Environmental issues (pages 20-27) Value chain (pages 34 and 35)
9	"Companies must favor the development and diffusion of environmentally friendly technologies"	
ANTI-CORRUPTION		
10	"Companies must work against corruption in all its forms, including extortion and bribery"	Compliance system (page 11, 12) Value chain (p. 35)

GRI content index

INDICATOR	DESCRIPTION	PAGE NUMBER AND/OR COMMENT	EXTERNAL VERIFICATION	GLOBAL COMPACT PRINCIPLE
102.1	Organization name's	2	Yes	
102.2	Activities, brands, products and services	7	Yes	
102.3	Headquarters location	2	Yes	
102.4	Location of operations	2	Yes	
102.5	Ownership and legal form	limited society	Yes	Principle 6
102.6	Markets served	6	Yes	
102.7	Organization size	6, 29	Yes	
102.8	Information about employees and other workers	28-32; section 6: human team	Yes	
102.9	Supply chain	33-36	Yes	Principle 6
102.10	Significant changes to the organization and its supply chain	33-36; section 7: value chain	Yes	Principle 6
102.11	Precautionary Approach Principle	Congalsa always operates from the perspective of legality, integrating all the necessary requirements to carry out the activity in accordance with legal regulations. The possible risks detected in each area are managed in each department, always with the agreement of the highest governance body.	Yes	
102.12	External initiatives	42 ; section 9: Society	Yes	
102.13	Membership of associations	36	Yes	
102. STRATEGY				
102.14	Statement from Senior Executives Responsible for Decision Making	9	Yes	
102.15	Main impacts, risks and opportunities	9-12	Yes	

INDICATOR	DESCRIPTION	PAGE NUMBER AND/OR COMMENT	EXTERNAL VERIFICATION	GLOBAL COMPACT PRINCIPLE
102. Ethics and integrity				
102.16	Values, Principles, standards and rules of conduct	All the information according to the values and Principles is available on the web, in addition to what is included in this report.	Yes	Principle 10
102.17	Mechanisms for advice and ethical concerns	11-12	Yes	
102. Governance				
102.18	Governance structure	9-10	Yes	
102.19	Delegation of authority	At Congalsa, each person with a management position assumes their own responsibilities in economic, environmental or social matters.	Yes	
102.20	Executive-level responsibility for economic, environmental and social issues	9-10. Aspects related to sustainability are managed at the highest level of the organization	Yes	
102.21	Consultation with stakeholders on economic, environmental issues and social	13-15; Interests managed by the representative of each Group, as well as by the Department of External Relations	Yes	
102.22	Composition of the highest governance body and its committees	9	Yes	
102.23	President of the highest governing body	9	Yes	
102.24	Nomination and selection of the highest governance body	9	Yes	
102.25	Conflicts of interest	If it occurs, there are monthly meetings of the Management Committee in which issues such as these are resolved.	Yes	

INDICATOR	DESCRIPTION	PAGE NUMBER AND/OR COMMENT	EXTERNAL VERIFICATION	GLOBAL COMPACT PRINCIPLE
102.26	Role of the highest governance body in selecting objectives, values and strategy	9-10	Yes	
102.27	Collective knowledge of the highest governance body	9-10	Yes	
102.28	Evaluation of the performance of the highest governance body	9-10; Annual report, management team meeting	Yes	
102.29	Identification and management of economic, environmental and social impacts	Throughout the Report itself, the impacts principals managed by the organization; as well as risks of any kind.	Yes	
102.30	Effectiveness of risk management processes		Yes	
102.31	Evaluation of economic, environmental and social issues		Yes	
102.32	Role of the highest governance body in preparing sustainability reports	The selection of material topics, as well as the identification of the most relevant content, is distributed throughout the entire management team.	Yes	
102.33	Communication of critical concerns	Sustainability report + EMAS	Yes	
102.34	Nature and total number of critical concerns	For Congalsa, the critical issues are covered in the different material topics reported in this report.	Yes	
102.35	Remuneration policies		Yes	
102.36	Process for determining remuneration	In Congalsa, salary ranges are established by position, guaranteed by Collective Agreement, applicable to all the people who work in the organization; under criteria of equality, parity and non-discrimination.	Yes	
102.37	Involvement of stakeholders in remuneration		Yes	
102.38	Annual Total Compensation Ratio		Yes	
102.39	Ratio of the percentage increase of the annual total compensation		Yes	

INDICATOR	DESCRIPTION	PAGE NUMBER AND/OR COMMENT	EXTERNAL VERIFICATION	GLOBAL COMPACT PRINCIPLE
102. Participation of Stakeholders				
102.40	Stakeholders list	14-15	Yes	
102.41	Collective negotiation agreements	30. The agreements or collaborations of a public nature are exposed throughout the Report. The rest are subject to the Confidentiality Principle	Yes	Principle 3
102.42	Identification and selection of stakeholders	14-15	Yes	
102.43	Approach to the participation of stakeholders	13-14-15	Yes	
102.44	Key issues and concerns raised	16-17	Yes	
102. Reporting Practices				
102.45	Entities included in the consolidated financial statements	46. They can be consulted in the financial reports and EINF	Yes	
102.46	Definition of the contents of the reports and the Boundaries of the topic	47	Yes	
102.47	List of material topics	17-18	Yes	
102.48	Information restatement	All the new information necessary to report the performance for the year 2021 has been included in this document.	Yes	
102.49	Reporting Changes		Yes	
102.50	Period covered by the report	From January 1, 2021 to December 31, 2021	Yes	
102.51	Date of last report	2020	Yes	
102.52	Reporting cycle	Annual	Yes	
102.53	Contact point for questions about the report	info@congalsa.com Web: contact	Yes	
102.54	Declaration of preparation of the report in accordance with the GRI standards	This report has been prepared in accordance with the Comprehensive option of the GRI Standards	Yes	
102.55	GRI content index	48-58	Yes	
102.56	External verification	59	Yes	

INDICATOR	DESCRIPTION	PAGE NUMBER AND/OR COMMENT	EXTERNAL VERIFICATION	GLOBAL COMPACT PRINCIPLE
103. Management approach				
103.1	Explanation of the material topic and its boundary	In order to speed up the reading of the report, the material aspects and the management approach have been analyzed throughout the sections of the document. When considered necessary, links and accesses to the published information that expands the content are included.	Yes	
103.2	The management approach and its components		Yes	
103.3	Evaluation of the management approach		Yes	
201. Economic performance				
201.1	Direct economic value generated and distributed	Information available in the organization's consolidated annual accounts.	Yes	
201.2	Financial implications and other risks and opportunities arising from climate change	20-21	Yes	
201.3	Defined benefit plan obligations and other retirement plans	There are no retirement plans. Yes, there are social benefits for employees that are complementary to their salary.	Yes	
201.4	Financial assistance received from the government	Not received in 2021	Yes	
202. Market presence				
202.1	Ratio of the standard entry-level wage by gender compared to the local minimum wage	In Congalsa, in 2021, the Initial Minimum Wage stood at €1,034.82, 8.2% more than the SMI established in Spain (€950); regardless of the sex of the person joining.	Yes	
202.2	Proportion of senior executives hired from the local community	p. 9. All directors come from state territory, except for one director who is a foreigner from the EU (France)	Yes	
203. Indirect economic impacts				
203.1	Investments in infrastructures and services supported	21, 24, 40. Environmental investments: €405,769.59	Yes	
203.2	Significant indirect economic impacts	Social investments in the community: €66,659	Yes	
204. Procurement Practices				
204.1	Proportion of spending on local suppliers	42	Yes	
205. Anti-corruption				
205.1	Operations assessed for risks related to corruption	11-12 At Congalsa, a Compliance system has been implemented, in addition to a supplier evaluation procedure with sustainability and social responsibility criteria, as well as a Code of Conduct for the organization.	Yes	Principle 10
205.2	Communication and policy training and anti-corruption procedures		Yes	Principle 10
205.3	Confirmed cases of corruption and measures taken	In 2021, during the audits carried out by the Congalsa team, no breaches or incidents related to this matter have been detected.	Yes	Principle 10

INDICATOR	DESCRIPTION	PAGE NUMBER AND/OR COMMENT	EXTERNAL VERIFICATION	GLOBAL COMPACT PRINCIPLE
206. Unfair competition				
206.1	Legal actions related to unfair competition and monopolistic practices and against free competition.	Congalsa's performance regarding sectoral practices is in line with the commitments made with the respective sectoral associations. In addition, Principles and ethical and conduct criteria are integrated. Measures are implemented to ensure compliance and surveillance. During 2021, neither legal actions have been adopted on this issue nor have they been detected by the different complaint and communication channels enabled.	Yes	Principle 10
207. Taxation				
207.1	Tax approach		Yes	
207.2	Fiscal governance, control and risk management	46	Yes	
207.3	Participation of stakeholders and management of concerns in tax matters	Specific tax information is included in the annual accounts report.	Yes	
207.4	Country-by-country reporting	The scope of this report on the activities of Congalsa S.L. in Spain.	Yes	
300. ENVIRONMENTAL ASPECTS 301. Materials				
301.1	Materials used by weight or volume	26	Yes	
301.2	Recycled inputs		Yes	
301.3	Reused products and packaging materials	26	Yes	
302. Energía				
302.1	Energy consumption within the organization	25	Yes	Principle 9
302.2	Energy consumption outside the organization	25	Yes	Principle 9
302.3	Energy intensity	25	Yes	Principle 9
302.4	Reduction of energy consumption	25	Yes	Principle 9
302.5	Reduction of energy requirements of products and services	Due to the nature of the product manufactured by Congalsa, the final consumer is the one who determines the more or less efficient use of the product's cooking method. However, Congalsa works to offer alternatives that require less cooking process; which results not only in saving time for the consumer; but in a lower energy consumption during its preparation.	Yes	Principle 9

INDICATOR	DESCRIPTION	PAGE NUMBER AND/OR COMMENT	EXTERNAL VERIFICATION	GLOBAL COMPACT PRINCIPLE
303. Water and effluents				
303.1	Interaction with water as a shared resource	24 Due to the nature of water production, the resource is used in manufacturing processes. By directly implying the use for the manufacture of food products, there are restrictions for its recycling and reuse, not being possible in any case. However, in Congalsa there are actions to treat and purify the water consumed as much as possible. The EMAS Environmental Declaration details the entire procedure and treatment applied.	Yes	
303.2	Management of impacts related to water discharges	Does not apply. All the water collected comes from the network, with the corresponding permits	Yes	
303.3	Water extraction	24	Yes	
303.4	Water spills	24	Yes	
303.5	Water consumption	24	Yes	
304. Biodiversity				
304.1	Owned, leased or managed operations centers located within or adjacent to protected areas or areas of high value for biodiversity outside protected areas	All the land is in an industrial area, with the corresponding necessary legal authorizations.	Yes	
304.2	Significant impacts of activities, products and services on biodiversity	22-23	Yes	
304.3	Habitats protected or restored	All the land is in an industrial area, with the corresponding necessary legal authorizations.	Yes	
304.4	Species that appear on the IUCN Red List and on national conservation lists whose habitats are in areas affected by operations	Congalsa does not work with species or suppliers that operate with cataloged species.	Yes	
305. Emissions				
305.1	Direct GHG emissions (scope 1)	25	Yes	
305.2	Indirect GHG emissions when generating energy (scope 2)	25	Yes	
305.3	Other indirect GHG emissions (scope 3)	They are not included in the scope of this report	Yes	
305.4	GHG emissions intensity	Emission intensity: 0.097 t of CO ₂ per ton of manufactured product.	Yes	
305.5	Reduction of GHG emissions	25	Yes	
305.6	Emissions of substances that deplete the ozone layer (ODS)	Given the updating and maintenance of the facilities, there are no substances that pose a risk to atmospheric ozone	Yes	
305.7	Nitrogen oxides (NOX), sulfur oxides (SOX) and other significant air emissions	NOx emissions: 1,902 t/year SOx emissions: < 0.102 t/year CO emissions: < 0.108 t/year *The measurement of these indicators is done every two years. The last ones were made on 01/25/2021	Yes	

INDICATOR	DESCRIPTION	PAGE NUMBER AND/OR COMMENT	EXTERNAL VERIFICATION	GLOBAL COMPACT PRINCIPLE
306. Waste				
306.1	Waste generation and significant impacts related to waste	26	Yes	
306.2	Management of significant impacts related to waste	26	Yes	
306.3	Waste generated	26	Yes	
306.4	Waste not destined for disposal	26	Yes	
306.5	Waste destined for disposal	26	Yes	
307. Environmental compliance				
307.1	Non-compliance with environmental legislation and regulations	<p>There have only been punctual deviations in total and ammoniacal nitrogen. This is due to the production of a certain type of cephalopod with a high content of volatile basic nitrogen (VBN) in its composition. We are working on applying solutions with different actions, among which we value this attempt to incorporate this raw material already treated from origin to avoid this discharge to our WWTP.</p>	Yes	Principle 8
308. Supplier environmental assessment				
308.1	New suppliers that have passed evaluation and selection filters according to environmental criteria	35	Yes	
308.2	Negative environmental impacts in the supply chain and measures taken	<p>22-23, 34-35</p> <p>There is a revised and updated sustainability policy that integrates the reduction of the most significant environmental impacts evaluated.</p>	Yes	
401. Employment				
401.1	New employee hires and staff turnover	<p>28-29</p> <p>Contracts 2021:</p> <ul style="list-style-type: none"> - 6 controls (3 women and 3 men), - 3 employees (2 women and 1 man) - 9 operators (6 women and 3 men). <p>• In total, there were 146 new employees and 65 new employees out of an average workforce of 388 people.</p> <p>• Rotation rate of 3.65%</p>	Si	
401.2	Benefits for full-time employees that are not given to temporary or part-time employees	30	Yes	
401.3	Parental leave	30	Yes	

INDICATOR	DESCRIPTION	PAGE NUMBER AND/OR COMMENT	EXTERNAL VERIFICATION	GLOBAL COMPACT PRINCIPLE
402. Worker-company relations				
402.1	Minimum notice periods on operational changes	Changes that require the approval of the Company Committee are communicated at least one month in advance. The company has its own Collective Bargaining Agreement and has articles referring to the negotiation notice period, voluntary resignation, consultations, etc.	Yes	
403. Health and safety at work				
403.1	Occupational health and safety management system	29-31	Yes	
403.2	Hazard identification, risk assessment and incident investigation	29-31	Yes	
403.3	Occupational health services	29-31	Yes	
403.4	Worker participation, consultation and communication on health and safety at work	There is a Health and Safety Committee with equal composition between workers and the company, which meets regularly every three months in an ordinary meeting and in an extraordinary meeting each time an accident or incident of consideration occurs. The CSS is joint between representatives of the company (2 representatives) and representatives of the Works Council (2 representatives). In 2020, there were 1 employee representative and 4 workers.	Yes	
403.5	Training of workers on health and safety at work	All workers receive specific training in Occupational Risk Prevention according to the activity they are going to carry out in the company. Subsequently, the workers receive regular general training on prevention and specific training on certain risks and on certain activities or the use of machines.	Yes	
403.6	Promotion of the health of workers	29-30	Yes	
403.7	Prevention and mitigation of impacts on the health and safety of workers directly linked to business relationships	The workers of our suppliers are under the legislation of the country where their facilities are located, through audits, we verify the working conditions in these centers.	Yes	
403.8	Coverage of the occupational health and safety management system	The occupational health and safety management system covers 100% of the workforce	Yes	
403.9	Work accident injuries	29 Frequency rate: 20.61 Incidence rate: 3.61 Severity index: 2.83 Average sick leave duration (days): 137.36	Yes	
403.10	Occupational ailments and diseases	29	Yes	
404. Training and teaching				
404.1	Average hours of training per year per employee	30	Yes	
404.2	Programs to upskill employees and transition assistance programs	30	Yes	
404.3	Percentage of employees receiving regular performance and career development reviews	30	Yes	

INDICATOR	DESCRIPTION	PAGE NUMBER AND/OR COMMENT	EXTERNAL VERIFICATION	GLOBAL COMPACT PRINCIPLE
405. Diversity and equal opportunities				
405.1	Diversity in governing bodies and employees	9, 29	Yes	Principle 6
405.2	Ratio of base salary and remuneration of women versus men	In congalsa, the salary level is linked to the position held by the person, never to the gender of the person who works. consequently, there is no percentage difference between the base salary of women and that of men in each employment category.	Yes	Principle 6
406. Non-discrimination				
406.1	Cases of discrimination and corrective actions taken	Have not been detected	Yes	Principle 6
407. Freedom of association and collective bargaining				
407.1	Operations and suppliers whose right to freedom of association and collective bargaining could be at risk	The company's work centers are located in Spain and the rights of free association and collective bargaining are guaranteed. In the suppliers of the different countries, we are not aware of the violation of such rights by our Supplier Auditors.	Yes	Principle 3
408. Child labor				
408.1	Operations and suppliers with significant risk of incidents of child labor	Thanks to the audit and monitoring work that Congalsa carries out in its supply chain, the company can guarantee that it does not accept or allow practices that are harmful to the environment, that involve questionable working conditions or the use of children's work.	Yes	Principle 5
409. Forced or compulsory labor				
409.1	Operations and suppliers with significant risk of incidents of forced or compulsory labor	not identified	Yes	Principle 4
410. Security practices				
410.1	Security personnel trained in human rights policies or procedures	Security personnel belong to the company's staff. No specific training has been provided in this matter.	Yes	
411. Rights of indigenous peoples				
411.1	Cases of violations of the rights of indigenous peoples	Does not apply	Yes	
412. Human Rights Assessment				
412.1	Operations subject to reviews or evaluations impact on human rights	All providers are evaluated under the same criteria; that will include new clauses based on the needs or relevant issues that arise.	Yes	Principle 1 y 2
412.2	Employee training on human rights policies or procedures	As a whole, it is not considered to offer specific training in the matter. No cases of corruption have been detected, being a totally prohibited conduct in all relation with the Groups of Interest on the part of Congalsa.	Yes	Principle 1 y 2
412.3	Significant investment agreements and contracts with human rights clauses or subject to human rights screening	All commercial links established by Congalsa are covered by the content of the Code of Conduct and Good Practices.	Yes	Principle 1 y 2
413. Local communities				
413.1	Operations with local community engagement, impact assessments and development programs	Congalsa tiene en cuenta cómo la generación de empleo impacta sobre la comunidad, siendo éste su principal aportación en términos económicos y sociales. Además de ello, desarrolla una serie de acciones destinadas a fortalecer el vínculo con la comunidad.	Yes	
413.2	Operations with significant negative impacts - actual and potential - on local communities		Yes	

INDICATOR	DESCRIPTION	PAGE NUMBER AND/OR COMMENT	EXTERNAL VERIFICATION	GLOBAL COMPACT PRINCIPLE
414. Social evaluation of suppliers				
414.1	New suppliers that have passed selection filters according to social criteria	36	Yes	Principle 2
414.2	Negative social impacts in the supply chain and actions taken	34-35	Yes	
415. Public Policy				
415.1	Contributions to political parties and/or representatives	0	Yes	Principle 10
416. Customer health and safety				
416.1	Assessment of impacts on health and safety of the categories of products or services	39	Yes	
416.2	Cases of non-compliance related to the health and safety impacts of product and service categories	39	Yes	
417. Marketing and labeling				
417.1	Requirements for information and labeling of products and services	Congalsa applies the legislation on labeling and labeling in full on all its products.	Yes	
417.2	Cases of non-compliance related to the information and labeling of products and services	0	Yes	
417.3	Cases of non-compliance related to marketing communications	0	Yes	
418. Client Privacy				
418.1	Fundamental claims relating to breaches of customer privacy and loss of customer data	Congalsa complies with the LOPD, and no incidents have been detected in this regard.	Yes	
419. Socioeconomic Compliance				
419.1	Failure to comply with laws and regulations in the social and economic fields	0	Yes	

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