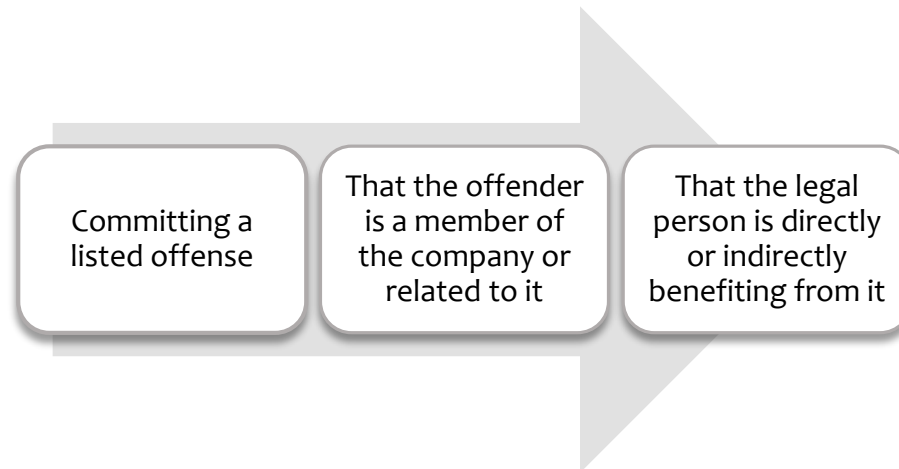


What is the Crime Prevention Program?

The reform of the Spanish Criminal Code in 2010 introduced the **legal person's criminal liability** in the following case:



As a result of this modification, companies face sentences ranging from a fine to the dissolution of the legal person in extreme cases.

The reform of the Spanish Criminal Code in 2015 introduced the figure of the Crime Prevention Program as reason for exemption or mitigating factor for the sentences given to a legal person.

Crime Prevention Program: *Set of rules and protocols aimed at preventing the appearance of unlawful conducts that may entail the criminal liability of Pescapuerta and its group of companies, guaranteeing prevention in case of possible situations that breach the legislation in force*

Implementation of the Crime Prevention Program

Pescapuerta and its group of companies are finalizing the implementation of a Crime Prevention Program that involves an optimum review of the company's processes, aiming at preventing particularly serious situations that may lead to the liability of the legal person.

A series of protocols have been thus approved, making up the basis for the practical development of the Crime Prevention Program

1

Code of Conduct: Common framework compiling the ethical values of Pescapuerta and its group of companies.

2

Regulation of the Supervision Committee : It regulates the rights and duties of the body in charge of supervising the Crime Prevention Program.

3

Ethical Channel Handbook: It regulates the operation of the channel used to report serious offenses that may lead to the criminal liability of Pescapuerta or any companies of the group.

Starting on the grounds already created, specific measures and controls will be gradually implemented within each department

All the protocols are available in the Employees' Portal.

Culture of Compliance

The gradual implementation of the Crime Prevention Program involves a change in the business culture that also permits elevating to a new level the values of the business activity based on good practices and governed by transparency.

This involves complying the regulations through specific action protocols and conducts, which are inspired by the ethical values and principals proclaimed by the company.

Thus, the Crime Prevention Program is more than just a tool for the good governance of the company; it is the philosophy on which the daily actions of the company are based.

All in all, it enables the consolidation of the good governance direction taken by the company from the very beginning, continuing with a meticulous observance of the regulations existing in all areas, not just in the criminal sphere, leading to the absence of civil, administrative and criminal liabilities for the company.

Supervision Committee

A Supervision Committee, in charge of managing, supervising and developing the Crime Prevention Program of Pescapuerta and its group of companies has been created.

The Committee is made up by a representative of each of the management, staff and human resources departments, with full competence within the framework of the Crime Prevention Program, such as supervising and promoting its knowledge and observance, as well as the approval of development and management rules of the Ethical Channel.

Ethical Channel

A confidential channel, managed by the Supervision Committee, has been created in order to report serious infringements that may involve the breach of the legislation in force, with criminal repercussions for the company. The reports may be addressed by:



Comitesupervision@pescapuerta.es



Avda. García Barbón, 109 4º planta. 36201 Vigo



Mailboxes shall also be available at the registered address of the company.



PESCAPUERTA



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