

MARBELIZE CODE OF CONDUCT

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MARBELIZE SA CODE OF CONDUCT

INDEX

A. Introduction to the Code

B. Implementation of the Code, Legal Framework and Validity, Enforcement and Supervision

C. Principles of the Code

Human Rights and Professional Conduct

1. Supply chain management and cascade effect
2. The Participation of workers and their Protection
3. The rights to freedom of association and collective bargaining
4. Absence of discrimination, violence or harassment
5. Fair Remuneration
6. Decent Working Hours
7. Occupational health and safety
8. Absence of child labor
9. Special Protection for Young Workers
10. Absence of Precarious employment
11. Absence of servitude, Forced Labor or human trafficking
12. Protection of the Environment
13. Ethical Business Behavior
14. Disciplinary Practices, Harassment or Mistreatment
15. No to violence against women
16. Management system, transparency and traceability
17. Protection of Data and Electronic Information

Sustainability

1. Conformity of the fisheries with national and international standards and resolutions for tuna fishing.
2. Actively prevent illegal fishing and its products.
3. Limitation of the capacity of the industrial purse seine fleet.
4. Support for fleet control systems and impact management.
5. Support and recognition of the best practices in tuna fishing

A. INTRODUCTION TO THE CODE

MARBELIZE SA has marked since its inception and by its own decision applied clear concepts that today link it to Corporate Social Responsibility, without a doubt today we are more convinced and committed to our initiative and the formal establishment of a Certification that is applied to BSCI and ICS. Taken as an action strategy, the necessary guidelines have been given to the organization to achieve its goal with the consequent commitment of the General Management of Marbelize SA.

The public commitment of Marbelize SA is closely oriented in its performance to the current values of its activity as a Processing Plant: Integrity, Temper, Teamwork, Personal Development.

Our Code includes international consensus practices and standards with respect to human rights, Environmental Care, Sustainability.

MARBELIZE SA seeks to maintain fair and stable business relationships with its suppliers and motivate them to direct their organization to accompany the application of the principles expressed in this Code of Conduct. Undoubtedly, maintaining close communication with suppliers will strengthen mutual understanding within the framework of Corporate Social Responsibility.

B. IMPLEMENTATION LEGAL FRAMEWORK

The United Nations Universal Declaration of Human Rights. The Ten Principles of the United Nations Global Compact. United Nations Guiding Principles on Business and Human Rights.

The Basic Conventions of the International Labor Organization (ILO).

FAO Code of Conduct for Responsible Fisheries.

National labor legislation.

National legislation on environmental matters.

International conventions and national laws will be understood to be applied to the flag country of fishing vessels.

SCOPE

Scope of the BSCI and ICS Social Responsibility management system applied by Marbelize S.A, is as follows:

Applies to all raw material suppliers.

Applies to all providers of services, materials and supplies.

The formulation and application of a Social Responsibility Management System require the participation of the following business elements:

- Business ethics
- Security and health at work
- Environmental management
- Human Resources

IMPLEMENTATION AND SUPERVISION

MARBELIZE SA puts its Code of Conduct into effect and, together with its suppliers, will seek a better form of application and follow-up considering the continuous improvements in the commercial relationship.

C. PRINCIPLES OF THE CODE OF CONDUCT

HUMAN RIGHTS AND PROFESSIONAL CONDUCT

MARBELIZE SA is committed to respecting the human rights of workers, offering them decent and respectful treatment, subject to National legislation and agreements duly recognized by the State. Therefore, its application must be consciously accepted.

1. Supply Chain Management and Cascade Effect

Being a BSCI participant, Marbelize and ICS recognize their ability to influence the social responsibility of their supply chains through their purchasing activities. Their business relationships with all players in the supply chain are managed responsibly and they expect this to be reciprocated.

This requires a cooperative approach, in which each business enterprise (a) involves the respective business partners in its supply chains, (b) takes all reasonable and appropriate steps within its sphere of influence to implement the Code of Conduct BSCI and ICS, and (c) exchange information to detect early any challenges that need to be mitigated.

2. The participation of workers and their Protection

Business enterprises should establish good management practices that engage workers and their representatives in robust information sharing on workplace issues, and ensure that appropriate measures are taken to protect workers, in accordance with the aspirations of the BSCI and ICS Code of Conduct. Our company informs all workers about their rights and responsibilities and protects them in accordance with the principles of the amfori BSCI Code of Conduct.

3. The Rights of Freedom of Association and Collective Bargaining

Business partners will: (a) respect the right of workers to form unions freely and democratically, (b) not discriminate against workers because of their union membership, and (c) respect the rights of workers to bargain collective.

4. Absence of discrimination, violence or harassment

Our company treats all workers with respect and dignity, ensuring that no worker is subjected to any form of violence, harassment, inhuman or demeaning treatment in the workplace, and does not discriminate. No discriminatory practice of any kind based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, affiliation, politics, union membership or marital status shall be applied in recruitment and employment activities.

5. Fair Remuneration

The workers of Marbelize S.A. and the companies supplying raw materials, materials, supplies and services must maintain and present, upon request, a signed copy of their contract which clearly reflects its duration, remuneration, in addition to other working conditions required by National legislation. It must be guaranteed that the payment of wages is made on a regular basis and in any case a decent wage that covers the basic needs of workers in accordance with National legislation. Workers, whether in processing plants or fishermen, will have the right to benefit from social protection under the conditions dictated by national laws and regulations.

6. Decent Working Hours

Marbelize and suppliers must ensure that their employees work in accordance with applicable laws and agreements regarding the number of hours and days of work. On board additional it must be ensured that the personnel on board enjoy rest periods of sufficient duration.

7. Occupational health and safety

Our company does not employ, directly or indirectly, any worker below the legal minimum age. Marbelize and its suppliers will comply with all the requirements of the country in which they operate regarding Occupational Health and Safety. They apply current management systems and guidelines relating to workplace health and safety management systems, such as the International Labor Organization (ILO) and International Maritime Organization (IMO) Guidelines, and must ensure, as a minimum, access to potable water, adequate ventilation and lighting, adequate accident prevention systems and safety in emergencies. In the case of fishing vessels, it must also guarantee free medical care on board, and the disembarkation of fishermen in the event of serious injuries or illnesses.

8. Absence of child labor

Marbelize S.A applies a ZERO tolerance despite the fact that the National Law and the ILO establish flexibility in contracting. Our company does not employ, directly or indirectly, any worker below the legal minimum age. However, our suppliers are under the option of considering the aforementioned Legislation.

9. Special Protection for Young Workers

Marbelize S.A, in case of hiring young workers, will ensure that their work does not imply risks to their health, safety, morals and development of their professional preparation or that they are subject to discrimination in their training. Marbelize's providers should therefore interfere with your application.

10. Absence of Precarious employment

Marbelize S.A. does not participate in or complicit, even through its business partners, in any form of servitude, forced, bonded, trafficked or involuntary labor, and adheres to international principles of responsible recruitment.

Marbelize and its suppliers guarantee that insecurity and social or economic vulnerability are not caused within commercial relationships, with the existence of a duly recognized and documented labor contract, and labor arrangements outside the Law must not be applied.

The worker must be duly informed of their rights, obligations and working conditions: working hours, salary and form of payment.

11. Absence of servitude, forced labor or human trafficking

Marbelize does not engage, even through business partners, in any form of servitude, forced, bonded, trafficked, or involuntary labor, including state-imposed forced labor.

All forms of work will be voluntary and workers will be free to leave employment with due notice. The Provider will not engage in or support any practice related to human trafficking.

12. Protection of the Environment

MARBELIZE S.A. and its Suppliers must ensure that they carry out their operations in compliance with all applicable legal requirements for the care and conservation of the environment, apply the appropriate measures to prevent, mitigate and remedy the negative effects on the surrounding communities, natural resources, the climate and the environment in general.

13. Ethical Business Behavior

No employee of the Company or Suppliers may be involved in acts of corruption, extortion, embezzlement or bribery.

The Company and its suppliers must maintain the confidentiality of information as a result of their business relationship.

The company and the suppliers will comply with the national and international legislation and agreements related to intellectual property.

14. Disciplinary Practices, Harassment or Mistreatment

Marbelize S.A. establishes policies of respect and dignity for all workers, rejecting any type of harassment, harassment or abuse, establishing opinion spaces for its collaborators, and disciplinary practices in accordance with local legislation.

15. No to violence against women

Marbelize S.A. Its purpose is to eradicate all types of violence and mistreatment of women, guaranteeing equality and prohibiting all forms of discrimination, denigration, infamy, demerit, offense, humiliation, harassment or behavior that violates the dignity of women, mainly when it is carried out constantly and injures the person, generating mistreatment or humiliation, whether they are carried out verbally, in writing or physically.

Marbelize and its suppliers will comply in accordance with the Constitution of the Republic, international instruments and other current regulations that establish guidelines for the prevention and eradication of violence against women.

16. Management system, transparency and traceability

Marbelize S.A. and its suppliers guarantee that all labor relations are established in accordance with national laws, uses and customs, and international employment regulations from the beginning of the contract to its completion; especially in the case of workers with a special status: young people, immigrants, national migrants, temporary workers, etc.

Considering the impact on the community, on natural resources and on the environment in general, establishing the necessary procedures to prevent and minimize the negative effects related to its activities.

17. Protection of Data and Electronic Information

Information is one of the intangible assets of our company, about clients, suppliers, distributors, employees, finances and data related to the products, for this reason, the diversified information they share with Marbelize S.A. is properly managed, implementing actions that reduce the risk, combining access controls, security and complying with the privacy and information protection regulations, established in the Organic Law for the Protection of Personal Data and in the constitution of the Republic of Ecuador in its article 66 numeral 19 establishes that "It is recognizes and will guarantee people: The right to protection of personal data, which includes access to and decision on information and data of this nature, as well as its corresponding protection. The collection, filing, processing, distribution or dissemination of this data or information will require the authorization of the owner or the mandate of the Law".

SUSTAINABILITY

MARBELIZE SA expects from its suppliers a vision that supports the objective of achieving responsible fishing for the long term for the benefit of future generations. It is necessary for this purpose to comply with national and Regional Organization regulations.

- Conformity of the fisheries with national and international standards and resolutions ORP'S.
- Vessels supplying raw material must be registered with the Undersecretary of Fisheries Resources of Ecuador and with the Regional Fisheries Organization ORP'S., they must have a valid IMO (or "Unique Vessel Identifier" UVI) and belong to a country that appears or has requested to appear as a contracting or cooperating party of the corresponding Regional Fisheries Organization (RFMO).
- Marbelize SA will not buy tuna from those vessels identified by the Local Authority and by the Regional Fisheries Organization (ORP) as not applying to the imposed bans or that do not respect the conservation areas established by the Regional Fisheries Organizations (ORPs) or coastal countries.
- Marbelize SA will not source tuna from vessels where there are indications or evidence of the practice of shark finning.
- Marbelize SA will not supply ships on official IUU lists.
- Marbelize SA undertakes not to purchase fish from industrial purse seine vessels (335 m³ hold) that are not fishing or under a construction agreement before December 31, 2012 (and completed by June 30, 2015).
- Marbelize SA will not be supplied with fish that have been transshipped on the high seas without complying with the RFMO's resolutions.
- Purse-seine supplying Vessels will carry out bycatch release practices for turtles and sharks or any other species identified by the Regional Fisheries Organization as sensitive in terms of conservation.
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- The Supplier of raw material will carry out its fishing practices with FADs that minimize the entanglement of sharks and turtles. It will carry out monitoring plans for FADs.
- Total retention of catches on board and unloading of all bycatch, both tuna and other species that have not been released alive, except for species whose retention is prohibited or fish unfit for human consumption.
- Purse-seine vessels must show satellite monitoring of fishing operations through VMS systems.

**General Manager
MARBELIZE S.A.**

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