

MARBELIZE CODE OF CONDUCT

ENG-GG-07 / SEE 4 / DATE 07-19-2024

MARBELIZE SA CODE OF CONDUCT INDEX

A. Introduction to the Code

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

C. Principles of the Code

Human Rights and Professional Conduct

1. Supply chain management and the cascading effect
2. Workers' Participation and Protection
3. The rights of freedom of association and collective bargaining
4. Absence of discrimination, violence or harassment
5. Fair Remuneration
6. Decent Working Day
7. Occupational Health and Safety
8. Absence of child labor
9. Special Protection for Young Workers
10. Lack of precarious employment
11. Absence of servitude, forced labor or human trafficking
12. Environmental Protection
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. Compliance of 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 best practices in tuna fishing.

A. INTRODUCTION TO THE CODE

MARBELIZE SA has marked from the beginning and by its own decision it 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 in 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 aligned in its actions with 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, and sustainability.

MARBELIZE SA seeks to maintain fair and stable commercial relations with its suppliers and to motivate them to guide their organization in the application of the principles expressed in this Code of Conduct. Without a doubt, maintaining close communication with suppliers will allow us to 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. The United Nations Guiding Principles on Business and Human Rights.

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

ILO Convention 188 (Work in Fishing Convention).

FAO Code of Conduct for Responsible Fisheries.

National labor legislation.

National legislation on environmental matters.

International conventions and national laws shall be deemed to apply to the country of flag of fishing vessels.

SCOPE

Scope of the BSCI and ICS Social Responsibility management system applied by Marbelize SA is as follows:

Applies to all raw material suppliers.

Applies to all providers of services, materials and supplies.

The formulation and implementation of a Social Responsibility Management System requires the participation of the following business elements:

- Business ethics
- Safety and Health at Work
- Environmental management
- Human Resources

APPLICATION AND SUPERVISION

MARBELIZE SA puts into effect its Code of Conduct and together with its suppliers will seek a better way of applying and monitoring it, taking into account continuous improvements in the business 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 dignified and respectful treatment, subject to national legislation and conventions duly recognized by the State. Therefore, its application must be consciously accepted.

1. Supply Chain Management and Cascade Effect

Marbelize, being a BSCI and ICS participant, recognises its ability to influence the social responsibility of its supply chains through its purchasing activities. Its business relationships with all actors in the supply chain are managed responsibly and it expects this to be reciprocal.

This requires a cooperative approach, in which each commercial company (a) involves the respective business actors in their supply chains, (b) take all reasonable and appropriate measures within their sphere of influence to implement the BSCI Code of Conduct and ICS, and (c) exchange information to detect in advance any challenges that need to be mitigated.

2. Workers' Participation and Protection

Businesses must establish good management practices that involve workers and their representatives in a robust exchange of information on workplace issues, and ensure that appropriate measures are taken to protect workers, in line 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 shall: (a) respect the right of workers to form trade unions freely and democratically, (b) not discriminate against workers on the basis of union membership, and (c) respect the rights of workers to engage in collective bargaining.

4. Absence of discrimination, violence or harassment

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

5. Fair Remuneration

Workers of Marbelize SA and companies supplying raw materials, materials, supplies and services must maintain and present upon request a signed copy of their contract, which clearly reflects the duration of the contract, remuneration, and other working conditions required by national legislation. It must be guaranteed that wages are paid regularly 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 Day

Marbelize and its suppliers must ensure that their employees work in accordance with applicable laws and conventions regarding the number of hours and days of work. In addition, on board it must be ensured that onboard personnel are provided with rest periods of sufficient duration.

7. Occupational Health and Safety

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

8. Absence of child labor

Marbelize SA applies ZERO tolerance despite the fact that the National Law and the ILO establish flexibility in hiring. Our company does not employ, directly or indirectly, any worker under the legal minimum age. However, our suppliers are free to consider the aforementioned Legislation.

9. Special Protection for Young Workers

Marbelize SA, when hiring young workers, will ensure that their work does not entail risks to their health, safety, morale and development of their professional training or that they are subject to discrimination in their training. Marbelize's suppliers should consequently be involved in its application.

10. Lack of precarious employment

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

Marbelize and its suppliers guarantee that within the commercial relations there is no insecurity or social or economic vulnerability, with the existence of a duly recognized and documented employment contract, and should not apply labor arrangements outside the law.

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

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 shall be voluntary and workers shall be free to leave employment with due notice. The Supplier shall not engage in or support any practice related to human trafficking.

12. Environmental Protection

MARBELIZE SA and its Suppliers must ensure that their operations are carried out in compliance with all applicable legal requirements for the care and conservation of the environment, applying appropriate measures to prevent, mitigate and remedy negative effects on surrounding communities, natural resources, 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 its suppliers will comply with national and international legislation and agreements relating to intellectual property.

13. Disciplinary practices, harassment or mistreatment

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

14. No to violence against women

Marbelize SA aims to eradicate all types of violence and abuse towards women, guaranteeing equality and prohibiting all forms of discrimination, denigration, infamy, demerit, offense, humiliation, harassment or behavior that violates the dignity of women, especially when this is carried out constantly and injures them, generating abuse or humiliation, whether exercised verbally, in writing or physically.

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

15. Management system, transparency and traceability

Marbelize SA and its suppliers guarantee that all employment relationships are established in accordance with national laws, customs and international employment standards from the beginning of the contract to the end of the contract, especially in the case of workers with a special status: young people, immigrants, national migrants, temporary workers, etc.

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

16. Protection of Data and Electronic Information

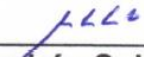
Information is one of the intangible assets of our company, about customers, suppliers, distributors, employees, finances and data related to the products, for this reason, the diversified information shared with Marbelize SA is properly managed, implementing actions that reduce risk, combining access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

SUSTAINABILITY

MARBELIZE SA expects its suppliers to have a vision that supports the goal of achieving responsible fishing over the long term for the benefit of future generations. To this end, it is necessary to comply with national and Regional Organization regulations.

- Compliance of fisheries with national and international standards and resolutions (ORPs).
- Vessels supplying raw materials must be registered with the Undersecretariat of Fisheries Resources of Ecuador and with the Regional Fisheries Organization (RFO), must have a valid IMO (or "Unique Vessel Identifier" UVI) and must belong to a country that is listed or has requested to be listed as a contracting or cooperating party of the corresponding Regional Fisheries Organization (RFO).
- Marbelize SA will not purchase tuna from those vessels identified by the Local Authority and the Regional Fisheries Organization (RFO) as not applying the bans imposed or that do not respect the conservation areas established by the Regional Fisheries Organizations (RFOs) or coastal countries.
- Marbelize SA will not source tuna from vessels where there are indications or evidence of shark finning.
- Marbelize SA will not supply vessels on official IUU lists.
- Marbelize SA undertakes not to purchase fish from industrial purse seiners (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 supply fish that has been transshipped on the high seas without complying with the resolutions of the OROP'S.
- Purse seiner supply vessels will carry out practices to release incidental catches of turtles and sharks or any other species identified by the Regional Fisheries Organization as sensitive in terms of conservation.
- Purse seiner supply vessels will carry out practices to release incidental catches of turtles and sharks or any other species identified by the Regional Fisheries Organization as sensitive in terms of conservation.
- The Raw Material Supplier will use FAD fishing practices to minimize entanglement of sharks and turtles. It will implement FAD monitoring plans.

- Total retention of catches on board and landing of all bycatch, including tuna and other species not released alive, except for species whose retention is prohibited or fish unfit for human consumption.
- Purse seiners must display satellite monitoring of fishing operations through VMS systems.



Ing. Andrés Cuka A.
Gerente General
MARBELIZE S.A.