

## CODE OF CONDUCT AND ETHICS OF MARBELIZE

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### MARBELIZE S.A. CODE OF CONDUCT

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## A. INTRODUCTION TO THE CODE OF CONDUCT

Since its inception, MARBELIZE S.A. has, by its own initiative, adopted clear principles that today are closely linked to Corporate Social Responsibility. We are now more convinced and committed than ever to our initiative and to the formal establishment of certification standards applied through BSCI and ICS. As part of this strategic approach, the necessary guidelines have been provided to the organization in order to achieve its objectives, with the full commitment of the General Management of MARBELIZE S.A.

The public commitment of MARBELIZE S.A. is firmly guided by the core values that govern its activities as a Processing Plant: Integrity, Resilience, Teamwork, and Personal Development.

Our Code incorporates internationally recognized practices and standards concerning respect for Human Rights, Environmental Protection, and Sustainability.

MARBELIZE S.A. seeks to maintain fair and stable business relationships with its suppliers and encourages them to align their organizations with the implementation of the principles set forth in this Code of Conduct. Maintaining close communication with suppliers will undoubtedly 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 Fundamental Conventions of the International Labour Organization (ILO).
- ILO Convention 188 (Work in Fishing Convention).
- The FAO Code of Conduct for Responsible Fisheries.
- National labor legislation.
- National environmental legislation.

International conventions and national laws shall be understood as applicable to the flag state of fishing vessels.

## SCOPE

The 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 service, material, and supply providers.

The development and implementation of a Social Responsibility Management System require the participation of the following business areas:

- Business Ethics
- Occupational Health and Safety
- Environmental Management
- Human Resources
- Sustainability

## APPLICATION AND MONITORING

MARBELIZE S.A. hereby enforces its Code of Conduct and, together with its suppliers, will seek the best methods for implementation and monitoring, considering continuous improvements in the business relationship.

## C. PRINCIPLES OF THE CODE OF CONDUCT

### HUMAN RIGHTS AND PROFESSIONAL CONDUCT

MARBELIZE S.A. is committed to respecting the human rights of its workers, providing them with dignified and respectful treatment, in compliance with national legislation and international conventions duly recognized by the State. Therefore, the application of this Code must be consciously accepted.

#### 1. Supply Chain Management and Cascade Effect

As a participant in BSCI and ICS, MARBELIZE S.A. recognizes its ability to influence social responsibility throughout its supply chains through its purchasing activities. Its business relationships with all actors within the supply chain are managed responsibly, and the company expects this commitment to be reciprocal.

To achieve this, a cooperative approach is necessary, whereby each business partner shall:

- (a) involve the respective business actors within their supply chains;
- (b) adopt all reasonable and appropriate measures within their sphere of influence to implement the BSCI and ICS Code of Conduct; and
- (c) exchange information in order to identify at an early stage any challenges requiring mitigation.

#### 2. Worker Participation and Protection

Business partners shall establish sound management practices that involve workers and their representatives in a meaningful exchange of information regarding workplace-related issues, and shall ensure that appropriate measures are taken to protect workers in accordance with the principles of the BSCI and ICS Code of Conduct.

Our company informs all workers of their rights and responsibilities and protects them in accordance with the principles of the amfori BSCI Code of Conduct.

#### 3. Freedom of Association and Collective Bargaining Rights

Business partners shall:

- (a) respect the right of workers to freely and democratically form trade unions;
- (b) not discriminate against workers because of union membership; and
- (c) respect workers' rights to engage in collective bargaining

#### 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, inhumane treatment, or degrading conduct in the workplace, and does not tolerate discrimination.

No discriminatory practices shall be applied on the basis of race, color, age, gender, sexual orientation, ethnicity, disability, religion, political affiliation, union membership, or marital status in hiring and employment practices.

## **5. Fair Remuneration**

Workers of MARBELIZE S.A. and suppliers of raw materials, materials, supplies, and services must maintain and provide, upon request, a signed copy of their employment contract clearly stating its duration, remuneration, and other working conditions required by national legislation. It must be ensured that wages are paid regularly and, in all cases, provide a living wage sufficient to cover workers' basic needs in accordance with national legislation. Workers, whether employed in processing plants or engaged in fishing activities, shall be entitled to benefit from social protection under the conditions established by national laws and regulations.

## **6. Decent Working Hours**

MARBELIZE S.A. and its suppliers shall ensure that employees work in accordance with applicable laws and agreements regarding working hours and rest days. Additionally, onboard personnel must be guaranteed sufficient rest periods.

## **7. Occupational Health and Safety**

Our company does not employ, directly or indirectly, any worker below the legal minimum age.

MARBELIZE S.A. and its suppliers shall comply with all occupational health and safety requirements applicable in the countries where they operate. They shall apply current management systems and guidelines related to workplace health and safety management, such as those established by the International Labour Organization (ILO) and the International Maritime Organization (IMO), ensuring at a minimum access to potable water, adequate ventilation and lighting, accident prevention systems, and emergency safety measures. In the case of fishing vessels, free onboard medical care and the disembarkation of fishers in the event of serious injury or illness shall also be guaranteed.

## **8. Absence of Child Labor**

MARBELIZE S.A. applies a ZERO tolerance policy regarding child labor, despite the flexibility allowed under national legislation and ILO standards. Our company does not employ, directly or indirectly, any worker below the legal minimum age. However, suppliers may consider the provisions established under the aforementioned legislation.

## **9. Special Protection for Young Workers**

If MARBELIZE S.A. hires young workers, it shall ensure that their work does not pose risks to their health, safety, morals, development, or professional training, nor expose them to discrimination during their training process. MARBELIZE's suppliers are likewise expected to support and apply these principles.

## **10. Absence of Precarious Employment**

MARBELIZE S.A. neither participates in nor is complicit, even through business partners, in any form of servitude, forced labor, bonded labor, trafficking, or involuntary labor, and adheres to international principles of responsible recruitment.

MARBELIZE S.A. and its suppliers guarantee that commercial relationships do not create social or economic insecurity or vulnerability, ensuring the existence of duly recognized and documented employment contracts and refraining from any labor arrangements outside the law.

Workers must be properly informed of their rights, obligations, and working conditions, including working hours, wages, and payment methods.

## **11. Absence of Servitude, Forced Labor, or Human Trafficking**

MARBELIZE S.A. does not participate, even through business partners, in any form of servitude, forced labor, bonded labor, trafficking, or involuntary labor, including state-imposed forced labor.

All work shall be voluntary, and workers shall have the freedom to leave employment with appropriate notice. Suppliers shall neither engage in nor support any practice related to human trafficking.

## **12. Environmental Protection**

MARBELIZE S.A. and its suppliers shall ensure that their operations comply with all applicable legal requirements for environmental protection and conservation, implementing appropriate measures to prevent, mitigate, and remediate negative impacts on surrounding communities, natural resources, climate, and the environment in general.

## **13. Ethical Business Conduct**

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

The Company and its suppliers must maintain the confidentiality of information arising from their business relationship.

The Company and its suppliers shall comply with national and international legislation and agreements related to intellectual property rights.

## **14. Disciplinary Practices, Harassment, or Abuse**

MARBELIZE S.A. establishes policies based on respect and dignity for all workers, rejecting any form of harassment, intimidation, or abuse, promoting spaces for employee participation and opinions, and applying disciplinary practices in accordance with local legislation.

## **15. No Violence or Discrimination**

MARBELIZE S.A. categorically rejects any form of violence and discrimination in the workplace and in all activities related to the organization.

No act of physical, psychological, verbal, sexual, economic, or digital violence that threatens the dignity, integrity, and well-being of individuals shall be tolerated. Likewise, any discriminatory conduct based on gender, gender identity, sexual orientation, age, disability, marital status, ethnicity, nationality, migration status, religion, socioeconomic status, or any other legally protected personal characteristic is prohibited.

MARBELIZE S.A. aims to eradicate all forms of violence and mistreatment against women, guaranteeing equality and prohibiting all forms of discrimination, denigration, defamation, humiliation, harassment, or behavior that undermines women's dignity, particularly when carried out repeatedly and causing abuse or humiliation, whether verbal, written, or physical.

MARBELIZE S.A. and its suppliers shall comply with the Constitution of the Republic, international instruments, and all applicable regulations establishing guidelines for the prevention and eradication of violence against women.

All employees, executives, contractors, suppliers, and third parties associated with the company must maintain respectful behavior, promoting a safe, inclusive, and harassment-free work environment.

Any violation of this section shall be subject to investigation and the application of corresponding disciplinary measures in accordance with internal regulations and applicable legislation.

The company guarantees confidential reporting mechanisms and protection against any form of retaliation.

## 16. Management System, Transparency, and Traceability

MARBELIZE S.A. and its suppliers guarantee that all labor relationships are established in accordance with national laws, customs and practices, and international labor standards from recruitment through termination, especially in the case of workers with special status such as young workers, immigrants, domestic migrants, temporary workers, etc.

The company also considers the impact of its activities on communities, natural resources, and the environment in general, establishing the necessary procedures to prevent and minimize negative effects associated with its operations.

## 17. Protection of Data and Electronic Information

Information is one of the company's intangible assets, including information related to customers, suppliers, distributors, employees, finances, and product-related data. Therefore, MARBELIZE S.A. properly manages the diverse information shared with the company by implementing actions that reduce risk through access controls and security measures, while complying with privacy and information protection regulations established under the Organic Law on Personal Data Protection and Article 66, paragraph 19 of the Constitution of the Republic of Ecuador, which states:

"Individuals are recognized and guaranteed the right to the protection of personal data, including access to and decision-making regarding such information and data, as well as its corresponding protection. The collection, storage, processing, distribution, or dissemination of such data or information shall require the authorization of the data subject or a legal mandate."

## 18. Environmental, Climate, and Sustainability Commitment

MARBELIZE S.A. establishes as a fundamental principle of conduct that all employees, contractors, and suppliers shall act responsibly toward the environment, climate change, and the sustainable use of natural resources, in compliance with applicable legislation, international sustainability standards, and the organization's corporate values.

Within this framework, all persons and entities associated with the company are expected to:

- Use natural resources such as energy, water, and fuels responsibly and efficiently, avoiding waste and promoting practices that contribute to reducing environmental impacts and the carbon footprint associated with operations.
- Act responsibly regarding climate change by supporting corporate initiatives aimed at the progressive reduction of carbon emissions through responsible behavior, efficient use of resources, and compliance with internal guidelines.
- Comply with provisions established for the protection of water resources, preventing pollution, improper water use, and any negative impact on receiving bodies of water and surrounding communities.

- Ensure proper and safe waste management, prioritizing waste prevention at the source, proper segregation, recycling where applicable, and environmentally sound handling of hazardous waste, in accordance with internal procedures and applicable regulations.
- Respect the principles of sustainable sourcing and procurement, ensuring that products, raw materials, and services come from legal, responsible, and environmentally sustainable sources, avoiding any relationship with illegal, unregulated, or environmentally harmful activities.
- Contribute to the protection of biodiversity and marine ecosystems by supporting responsible fishing practices and the conservation of natural resources, in line with the company's sustainability commitments.
- Actively participate in environmental, energy, and climate awareness and training programs, applying the good practices promoted by the organization in their daily activities.
- Maintain transparent and responsible conduct with communities and stakeholders, promptly communicating any situation that may generate environmental or social impacts and using the established mechanisms for addressing concerns and complaints.

## 19. Whistleblowing Channel, Ethics, and Non-Retaliation

MARBELIZE S.A. guarantees the existence of confidential and accessible mechanisms through which workers, suppliers, contractors, and other stakeholders may report any conduct that violates this Code, applicable legislation, or the ethical principles of the organization.

The company guarantees that:

- Confidential reporting channels are available for receiving complaints and reports.
- The identity of the whistleblower will be protected when requested.
- Retaliation against individuals who report situations in good faith will not be tolerated.
- All reports will be investigated objectively, impartially, and promptly.
- Corrective actions will be implemented when appropriate.

MARBELIZE S.A. promotes an organizational culture based on transparency, integrity, and trust.

## 20. Human Rights Due Diligence

MARBELIZE S.A. implements due diligence processes to identify, prevent, mitigate, and manage actual or potential adverse human rights impacts within its operations and supply chain.

This process includes:

- Periodic human rights risk assessments.

- Identification of risks related to countries, fishing fleets, suppliers, and operations.
- Implementation of mitigation plans.
- Continuous monitoring and review of controls.
- Integration of human rights criteria into procurement and contracting processes.

## **21. Responsible Purchasing and ESG Supplier Assessment**

MARBELIZE S.A. promotes a responsible supply chain by integrating environmental, social, ethical, and governance (ESG) criteria into the selection, evaluation, and monitoring of suppliers.

To this end, the company may:

- Assess ESG risks prior to contracting.
- Require formal acceptance of the Code of Conduct.
- Conduct social, environmental, or ethical audits when applicable.
- Establish corrective action plans with suppliers.
- Provide training and support for continuous improvement.

## **22. Sustainability Governance and Social Responsibility**

MARBELIZE S.A. establishes governance mechanisms to ensure the proper implementation of its sustainability and social responsibility system.

The organization may establish:

- Designated personnel responsible for Sustainability and ESG matters.
- Internal sustainability committees.
- Periodic review of ESG performance.
- Integration of ESG objectives into strategic planning.

## C. CODE OF ETHICS

MARBELIZE S.A. has established clear safety principles in the development of its activities. The organization reaffirms its ongoing commitment to safe operations, framed within compliance with the Corporate Control and Security System Policy.

Likewise, the company promotes fair, transparent, and stable business relationships with its employees, suppliers, and other stakeholders, encouraging the adoption and compliance with the principles established in this Code of Ethics.

### 1. Prevention of Money Laundering and Trafficking of Controlled Substances

The company maintains a firm commitment to preventing money laundering, the financing of illicit activities, and trafficking of substances subject to legal control.

All employees shall:

Report any suspicious transaction or unusual activity through the established internal channels or to the competent authorities when applicable.

Refrain from participating directly or indirectly in activities related to money laundering or trafficking of illegal substances.

### 2. Prevention of Alcohol and Drug Use

The company promotes a safe, healthy, and substance-free work environment that could affect performance or workplace safety. The following are strictly prohibited:

Consumption of alcohol or drugs during working hours or within company facilities.

Reporting to work under the influence of alcohol or narcotic substances.

Refusal to undergo random alcohol and drug testing, in accordance with applicable legislation.

### 3. Promotion of Tax and Customs Compliance Culture

Compliance with tax and customs obligations constitutes an organizational responsibility. The company is committed to:

Promoting strict compliance with current tax and customs regulations.

Ensuring that all business operations are transparent, traceable, and properly documented.

### 4. Strengthening Standards of Business Conduct

The ethical conduct of employees is essential to maintaining the trust of clients, suppliers, and strategic partners. All employees shall:

Act with integrity, transparency, and honesty in all business relationships.

Reject any form of corruption, bribery, fraud, or conflict of interest.

Respect human, labor, and social rights in all operations and business relationships

## 6. Strengthening Security Measures

Security is a fundamental pillar for the sustainable development of operations. All employees shall comply with the following measures:

- **Cargo Security:** Ensure the safe storage, handling, and transportation of products, preventing deterioration, contamination, or tampering.
- **Cargo Units and Means of Transport:** Verify that vehicles, containers, and logistics equipment comply with established security standards.
- **Physical Access Security:** Prevent unauthorized access to facilities and ensure proper identification of personnel and visitors.
- **Facility Security:** Maintain operational physical security systems, including video surveillance, access controls, alarms, and other protection mechanisms.
- **Personnel Hiring Security:** Implement rigorous recruitment processes, including document validation and employment verification.
- **Information Security:** Protect confidential information through technological and administrative controls and compliance with data protection regulations.

## 7. Non-Compliance

Failure to comply with the provisions established in this Code shall be managed in accordance with the Internal Work Regulations and all other applicable regulations.

## SUSTAINABILITY

MARBELIZE S.A. expects its suppliers to share a vision that supports the objective of achieving responsible and sustainable fishing practices for the long-term benefit of future generations. To achieve this purpose, compliance with national regulations and those established by Regional Fisheries Management Organizations (RFMOs) is required.

- Compliance of fisheries with national and international standards and resolutions established by the RFMOs.
- Vessels supplying raw material must be registered with the Ecuadorian Undersecretariat of Fisheries Resources and the corresponding Regional Fisheries Management Organization (RFMO). They must hold a valid IMO number (or Unique Vessel Identifier – UVI) and belong to a country listed as, or applying to become, a contracting or cooperating party of the relevant RFMO.
- MARBELIZE S.A. shall not purchase tuna from vessels identified by local authorities or Regional Fisheries Management Organizations (RFMOs) as non-compliant with established fishing closures or conservation areas defined by RFMOs or coastal states.
- MARBELIZE S.A. shall not source tuna from vessels where there is evidence or indication of shark finning practices.
- MARBELIZE S.A. shall not source fish from vessels included in official IUU (Illegal, Unreported and Unregulated Fishing) lists.
- MARBELIZE S.A. commits not to purchase fish from industrial purse seine vessels (335 m<sup>3</sup> hold capacity) that were not fishing or under construction agreement prior to December 31, 2012 (and completed by June 30, 2015).
- MARBELIZE S.A. shall not source fish that has been transshipped at sea without compliance with RFMO resolutions.
- Supplier purse seine vessels shall implement bycatch release practices for turtles, sharks, and any other species identified by the RFMO as sensitive from a conservation perspective.
- Raw material suppliers shall conduct fishing operations using Fish Aggregating Devices (FADs) designed to minimize the entanglement of sharks and turtles and shall implement FAD monitoring plans.
- Full retention of catches onboard and landing of all bycatch species, including tuna and non-target species that were not released alive, shall be required, except for species whose retention is prohibited or fish deemed unfit for human consumption.
- Purse seine vessels must demonstrate satellite monitoring of fishing operations through Vessel Monitoring Systems (VMS).

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