

# Code of Conduct

*The values of TRANSMARINA C.A. are INTEGRITY, RESPECT AND RESPONSABILITY. These, are the pillars upon which we build our operations.*

Over the last 30 years, we have developed our business on a fundamental principle: In order to obtain long term benefits we not only have to satisfy all the applicable legal requirements but also guarantee that all our activities are sustainable. By doing so we strive to create substantial value for our community.

We firmly believe in having a strong compliance culture within our business. Our certifications not only reflect our commitment to our clients, but they also guide our actions. For us, maintaining regulatory compliance is more than just following specific requirements; it is also means having firm principles that can be applied to every level of our company and that offer a clear guidance to our employees. For this reason, following our Code of Conduct is a statement of our commitment with our employees and our environment. Additionally, it sets a guiding line upon which each of us will base our actions to reach our objectives.

As Legal Representative of TRANSMARINA C.A., my commitment is to make sure that the entire company is managed according to these principles, as well as to confirm that all our employees adhere to them.

**GENERAL MANAGER  
TRANSMARINA C.A.**



Integrity  
Honesty  
Responsability

**These words describe who we are.**

These are our values, guiding what we do in TRANSMARINA C.A.

**Conduct Standards**

We shall pursue our activities with honesty, integrity and respect for human rights as well as the interests of every employee.

We shall respect the legitimate interests of all those with whom we have commercial and employment relationships.

**Legislation Compliance**

TRANSMARINA C.A. and its employees shall comply with all rules and regulations in Ecuador, as well as with the current legislation and laws of the countries where we export our products.

**Employees**

TRANSMARINA C.A. is engaged in promoting a work environment that includes diversity and equal opportunities, as well as mutual trust and respect for human rights, avoiding any kind of discrimination or harassment.

We will recruit, employ and promote employees on the basis of the qualifications and abilities that the work requires.



We are committed to safe and healthy working conditions for all employees. We will provide employees with a total remuneration package that meets or exceeds the legal minimum standards or appropriate prevailing industry standards.

We will not use any type of forced or child labor, or any type of work that denigrates our employees.

We respect the dignity of the individual and the right of employees to freedom of association and collective bargaining.

We shall maintain a direct communication with all employees, maintaining confidentiality in any case.

#### **Clients**

TRANSMARINA C.A. is engaged in providing products and services that fulfill all quality standards, and that are safe to the health of those who consume them.

#### **Supply Chain**

TRANSMARINA C.A. is engaged in establishing mutually beneficial relationships with our suppliers, clients and other interested parties, who we will ensure also adhere to our principles.

#### **Environmental Care**

TRANSMARINA C.A. cares for the environment, assuring the sustainability of its business.

#### **Fair Competition**

TRANSMARINA C.A. firmly believes in fair competition and supports the development of fair competition laws.

All employees of TRANSMARINA C.A. will conduct their operations in accordance with the principles of fair competition and all applicable regulations.

#### **Integrity**

TRANSMARINA C.A. does not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain.

No employee of TRANSMARINA C.A. may offer, give or receive any gift or payment which is, or may be construed as being a bribe.

Any demand for or offer of a bribe must be rejected immediately and reported to management.

A large orange diamond shape with a white border, containing the text "Respect, Dignity and Fair Treatment".

## Respect, Dignity and Fair Treatment

A responsible company will only flourish in societies in which all rights are respected.

TRANSMARINA C.A. is committed to ensuring that all its employees work in an environment that promotes diversity, mutual trust and respect for human rights, as well as equal opportunities with no discrimination or harassment.

- **NO TO DISCRIMINATION:** Treat everyone fairly and equally, without discrimination on the grounds of race, age, role, gender, gender identity, religion, country of origin, sexual orientation, marital status, social situation, dependents, disability, social class or political views. This includes consideration for recruitment, promotion, rewards, benefits, training or retirement which must be based on merit.
- **NO TO PRECARIOUS EMPLOYMENT:** Ensure all employees' work is conducted on the basis of freely agreed and documented terms of employment, according to the current legal framework, clearly understood by and made available to relevant employees and others working for the company.
- **FAIR REMUNERATION:** Ensure all employees are provided with fair wages including a total remuneration package that meets or exceeds legal minimum standards or appropriate prevailing industry standards, and that remuneration terms established by legally binding collective agreements are implemented and adhered to. Other than legally mandated deductions, all other deductions from wages require the expressed and written consent of the employee.
- **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING:** We respect employees' rights freedom to join a legally recognized trade union, or any other body representing their collective interests. We strive to establish constructive dialogue and bargain in good faith with trade unions or representative bodies on employment conditions taking national laws into consideration.
- **NO TO FORCED LABOR:** The company strongly rejects the use of forced, compulsory or trafficked labor. We have a zero tolerance of forced labor.

- **NO TO CHILD LABOR:** The company strongly rejects the use of child labor, i.e. individuals under the local legal minimum working age or mandatory schooling age, whichever is prevalent.
- **DECENT WORK HOURS:** We will avoid exceeding regular and overtime hours allowed by the law. All overtime work will be on a voluntary basis.
- **SPECIAL PROTECTION FOR YOUNG EMPLOYEES:** When young workers are employed (insofar as it is short-term work experience schemes and work that forms part of an educational program are permitted), the company does not allow to require or allow them to do work that is mentally, physically, socially or morally dangerous or interferes with their schooling.
- **HEALTH AND SAFETY:** TRANSMARINA C.A. is committed to providing healthy and safe working conditions, as well as to comply with all applicable legislation and regulations. Everyone at TRANSMARINA C.A., has a role to play: Managers are responsible for the occupational health and safety of their reports. As a condition of our employment, we all have a duty to work safely.
- **COMPLAINTS:** Provide transparent, fair and confidential procedures for employees to raise relevant concerns. These must enable employees to discuss any situation where they believe they have been discriminated against, treated unfairly, without respect or dignity, with their direct line manager - or an independent manager - without fear of retaliation.
- **COMMUNICATION:** Maintain a clear and transparent system of employee and management communication that enables employees to consult and have an effective dialogue with management.

### **Oposing Corruption**

Integrity defines the way we behave, wherever we are. In TRANSMARINA C.A., it defines a guideline for our actions in order to achieve long term success.

### **Avoiding Conflicts of Interest**

Conflicts of interest can have a significant negative impact on the reputation and effectiveness of the company, its people and business.

This Code Policy sets out what employees must do to manage real or perceived conflicts of interest.

A large, dark gray diamond shape pointing downwards, containing the text "Corporate Ethical Behavior" in white, bold, sans-serif font.

**Corporate  
Ethical Behavior**

- Take, or divert to others, any business opportunities that arise in the course of doing their job, that could be of interest to the company.
- Allow their personal, financial or political activities to affect or be perceived to affect the way they do their job in the company.
- Work for, or provide any services to, competitors, customers or suppliers unless they have prior written approval from their line manager.
- Work as a public official unless they have prior written approval from their line manager.

#### **Anti - Bribery**

To support global efforts to fight corruption, most countries have laws that prohibit bribery: many apply these 'internationally' to behavior beyond their borders.

Dealings with public officials are particularly high risk: even the appearance of illegal conduct could cause significant damage to the company's reputation.

Employees must not, directly or indirectly (e.g. via suppliers, agents, distributors, consultants, lawyers, intermediaries or anyone else):

- Offer or give bribes or improper advantages (including facilitation payments) to any public official or other individual or third party, which are, or give the impression that they are, intended to influence decisions by any person about the company.
- Request or receive bribes or improper advantages from any third party, which may be, or give the impression that they may be, intended to influence decisions by the company about that third party.
- When an employee considers that a bribe, improper advantage or facilitation payment has been given or received, they must not conceal this, but report it to their line manager.



## Environmental Protection

In TRANSMARINA C.A. we are committed to sustainable corporate practices. We make an effort to use properly all natural resources in all the different phases of the life cycle of our products; we support the use of renewable resources in a sustainable manner and we also minimize the impact of our operations on the environment.

Throughout the life cycle of the product, we involve all our employees, starting with our fleet's crew and finishing with our consumers, with the purpose of reducing the environmental impact of our products and activities.

Our fleet complies with the current environmental legislation. Together with the WWF, we are implementing a Fishery Improvement Plan (FIP) on our longline fishing fleet; our purse seine fleet is also a member of TUNACONS and is developing their FIP in association with WWF.

TRANSMARINA C.A. does not buy or commercialize illegal, unreported or unlegislated fishing. Our fleet and our suppliers' fleet possess the appropriate permits and current authorizations.

Information is one of the company's most valuable business assets.

TRANSMARINA C.A. is committed to safeguarding and protecting our and any other information entrusted to us.

Information within our company is held in many different formats, including paper, electronically in documents or in IT applications & systems. Our requirements to protect the information apply to all formats.



## Safeguarding Information

### **Preventing Insider Trading**

Trading or encouraging others to trade on inside information, or giving it to unauthorized parties, is a criminal offence in several countries: a breach of the applicable laws can lead to fines and/or imprisonment.

Inside (or price sensitive) information means information that is not available to the public and that a reasonable investor would probably consider important in deciding whether to buy or sell a company's shares.

Examples of inside information include the following:

- Business results or forecasts for the whole company or for one of our listed subsidiaries
- A major new product, product claim or product incident/issue
- An acquisition, merger or divestment
- A sizeable restructuring project
- Major developments in litigation cases or in dealings with regulators or governments
- Revisions in dividend policy
- Changes in executive directors

### **Personal Data And Privacy**

TRANSMARINA C.A. respects the privacy of all individuals and the confidentiality of any personal data that we hold about them. All personal data must be up to date: inaccurate data must be corrected and records of any changes must be maintained.



**Transmarina  
Engaging  
Externally**

Throughout our value chain, from innovation to our consumers, TRANSMARINA C.A. and its employees must demonstrate the same ethical standards when engaging with others externally as when dealing with colleagues.

#### PRODUCT QUALITY

Our reputation is founded on delighting our consumers and customers with consistently product quality that meets or exceeds their needs and expectations. Our aim is to be the most trusted and preferred choice among our customers and consumers.

TRANSMARINA C.A. is committed to achieving this goal by meeting or exceeding all legal and regulatory requirements and through the rigorous application of our Quality Management System. Each product quality experience for our consumers depends upon all employees understanding their roles and responsibilities and ensuring that they adhere to the company's quality standards, business processes and regulatory requirements at all times.

We will take prompt and timely action wherever and whenever we encounter products which don't meet our standards or those required in the market place. We will continuously improve product quality experiences by using the insights gained from our performance measures and from consumer and customer feedback.