



Code of Ethics and Social Responsibility

In Eurofish we are committed to our vision and mission, which originate in our responsibility towards our employees who are an essential pillar for the progress of the company.

We absolutely respect our people, the community and the natural environment. Our values and Integrated Management System are focused on quality, work environment, safety, occupational health and social responsibility. They create the guidelines for our honest and principled activities.

The Code of Ethics and Social responsibility has been created for our organization and partners, including directors, managers, employees, the community, suppliers and contractors, who provide a service, represent us or have a relationship with the company in any way.

We invite our suppliers and contractors to be part of a responsible trade. It emphasizes the protection and respect of human rights, labor rights and ethical principles. We expect all our suppliers to follow the same line of social and ethical conduct, as they are the basis of our shared success and our commitment to social responsibility. As essential criteria when choosing suppliers, we expect each of them to adhere to the principles established in this document.

Eurofish is aware of the reality of today's world; therefore, we implement measures to promote education and culture. We also focus on developing strong and permanent bonds that encourage the progress of our team members, shareholders, suppliers and the community. Eurofish S.A. is committed to comply with policies regarding work, environment, safety and social responsibility. For this purpose, the company concurs with the following principles:



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Human Rights and Non - Discrimination Agreement

Our collaborators are our most important resource. Eurofish S.A. offers the same opportunities to all our employees and does not discriminate. We act upon a principle of equity, where we all have the right to be treated in the same way, regardless of our social situation or gender. We act based on our ethical values, our internal regulations, and we adhere to the international declarations established by the ILO. We promote teamwork, inclusion, respect and fair equitable treatment. We reject all disrespectful communications inside our organization or with our allies.

Every new worker has the right to an induction stage and training in the position they will perform. We count on the permanent support of their co-workers, who shall provide any helpful assistance, so that he or she can be prepared in the shortest possible time and easily integrate into their new activities. No discriminations are allowed on the basis of race, lineage, nationality, religion, age, disability, gender, marital status, sexual orientation, employee associations or political affiliation.

Eurofish S.A. has a policy of zero tolerance for harassment, discrimination, bribes, child labor, forced labor and human rights violations.

We safeguard a culture of mutual trust and we value differences of opinion as well as cultural diversity.

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The Rights of Freedom of Association and Collective Negotiation

Eurofish S.A. respects the rights of our employees to create labor unions or employee associations, as well as to initiate collective negotiations without any sort of reprisal or harassment. Recognizing and having respect for our collaborators freedom of association and their right to freely choose their representatives.

We are committed to open spaces for constructive dialogue, where respect and good faith prevail toward agreements that generate mutual benefits for organizational, labor and personal growth.

In the same way both, our employees and the community have the freedom to communicate any disagreement within any activity or situation, using the appropriate channels designed for that matter.



Fair Compensation

Our company respects the right of the employees to receive a fair compensation. We assure that no salary is lower than the sectoral minimum wage. We acknowledge the authorized 40 hours workweek. We also recognize extra hours, under the conventions established in the current legislation. Furthermore, we act in accordance to our Internal Regulations Code, and we always take into account the applicable declarations of the ILO.

Honorable Work Schedule

Our company respects the laws regarding legal working hours. Employees have the right to rest and enjoy their free time. They also have the right to work a reasonable amount of hours as well as to receive periodically paid vacations, in accordance to our Internal Regulations Code, the current legislation for Ecuador and the Universal Declaration of Human Rights.

Overtime is restricted according to local legal and contractual obligations. Necessary breaks are taken in order to guard the safety and health of our employees.

For the fleet, the company ensures that regular resting periods are taken by the crew, with the sufficient length in order to preserve their health and safety, according to daily working hours overseas and inherent activities within vessels.

Health and Safety in the Workplace

Our company endeavors to provide a healthy and safe workplace environment, as we comply with the current national legislation. We have identified hazards in different areas, in order to minimize them and therefore assure a secured working space for our employees. Eurofish S.A. guarantees permanent healthcare for our staff. As part of our commitment towards health and security, we permanently develop health and safety campaigns for our employees and the community.

The crew members of the fleet, are guaranteed to receive proper training and education concerning occupational health and safety.

No to Child Labor

Our company does not employ workers under the minimum legal age. Moreover, as we are conscious that children are the future of humankind, we promote internal programs to contribute to the education of our employees' children.

No to Precarious Employment

Our company employs all its collaborators under the regulations of the Ecuadorian legislation, and applies active types of contracts.



No to Forced Labor

Our company does not approve any kind of forced labor, workforce traffic or non-voluntary work.

Environmental Protection

Our company takes the necessary steps to avoid any degradation of the environment. As part of this commitment, Eurofish S.A. has an industrial Wastewater Treatment Plant, which guarantees pollutants-free discharges into the atmosphere. This ensures the health and well-being of the surrounding communities. Our Treatment Plant is design to receive waste water from other plants, supporting in the environmental management of the province. Additionally, Eurofish S.A. permanently works toward a cleaner production, striving to optimize resources and minimize environmental impacts such as water and energy consumption.

Within our fleet, we comply with the current environmental law. We are members of TUNA CONS, and with the support of the WWF, we are implementing a Fishery Improvement Project (FIP) for the purse-seiner fleet.

Eurofish S.A. verifies the origin of the raw material before its purchase, making sure that it does not come from illegal, unreported and unregulated fishing. Our fleet and that of our suppliers meet all current legal requirements and valid permits.

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Ethical Corporate Conduct

Our company has no tolerance for any act of corruption, extortion, misappropriation or bribes. Honesty is for us a corporate value; it is through this value that we instill its presence in all the levels of our organization. Our employees must understand that giving all their best during their working hours is part of their ethical behavior, as they contribute to the organization through their abilities and competences. Resources provided are to be used exclusively for labor purpose and not for personal matters.

We are responsible for protecting our company's assets, including our brand, innovations and intellectual property rights. Eurofish S.A. carefully protects confidential information, including personal data.

The executives, managers and supervisors, are committed to treating all staff in a respectful manner, and always following the Internal Regulations Code.

Eurofish S.A. employees are not authorized to accept any sort of present from suppliers (including money, gifts, invitations, entertainment, travel destinations, etc.). Suppliers failing to comply with this statement or any of the following requirements, may be excluded from request for proposals or will have their contracts terminated.



We count on having reliable and professional collaborators in all levels of the organization. Requiring everyone to act for the best interest of the Company. Any conflict of interest between Eurofish S.A. and possible personal benefit, must be avoided.

We expect every collaborator, subcontractor and ally to adhere to this Code of Ethics and Social Responsibility, making it part of their daily behavior. Through this behavior, we validate our honesty and respect for our company, colleagues, our allies, the community and the natural environment, expecting commitment from everyone. We count that everyone is familiarized with these policies, and that they will use their common sense to get through difficult situations, knowing that the Directives will always support honest and ethical behavior.

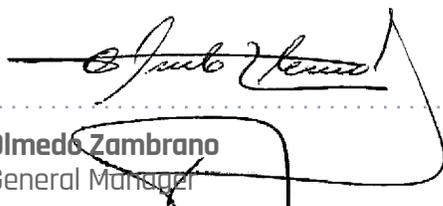
We foster an open culture where we can pose questions and concerns about the interpretation of this Code, allowing us to understand and internalize it in a better way. We encourage collaborators to reaching out to their managers in case there is a suspicion of a possible violation of this Code, developing trust in it.

Managers and high-level positions have a greater responsibility, not only with the interpretation of the Code, but in leading by example. As the only way our organizational values will be honored, it is very important to generate an open and transparent environment, where there is freedom to express suspicions in compliance with this Code.

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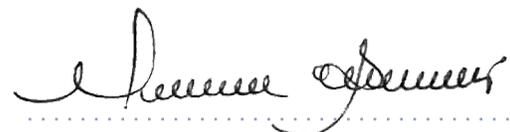
Disciplinary Measures

The violation, non-compliance or disregard towards the Code of Ethics, the law and other policy related to social responsibility, can lead to serious consequences for Eurofish S.A. and its collaborators (penalties, reputation damage, loss of clients, imprisonment, other disciplinary measures covered in the Internal Labor Regulations).



Olmedo Zambrano
General Manager

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Edisabel Gutiérrez
Human Talent Manager