



KIBU CODE OF CONDUCT

Version 1. June 2021

INTRODUCTION

We are aware of the impact of our activities on people and the environment, both at the local and global levels. That is why we consider necessary to contribute to the improvement of the environment in which we have a direct or indirect influence.

More than a declaration of principles, **KIBU's** Code of Conduct is a decalogue in which we summarize all our commitments toward social ethics, respect for the environment and the sustainability of the natural resources.

At the same time, we keep on working in spreading our principles throughout the value chain by means of our Code of Conduct for Suppliers, since we consider that all members of the value chain must be responsible for ensuring the fulfillment of ethical values and, also, for the total respect of human rights.

The present code of conduct is based on the International Labor Organization conventions ¹, the 10 principles of the United Nations Global Compact and the International Declaration of Human Rights.

The 10 clauses of our Code of Conduct describe all the principles that Frinsa complies with and promotes.

OUR 10 COMMITMENTS

- 1. Prohibition of forced labor**
- 2. Prohibition of child labor and respect for underage persons**
- 3. Non-discrimination and equal treatment**
- 4. Respect for freedom of association and collective bargaining**
- 5. Safe and hygienic working conditions**
- 6. Remuneration and benefits**
- 7. Working hours**
- 8. Business ethics**
- 9. Environmental protection and respect for local populations**
- 10. Sustainability of the marine resources**



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1. Prohibition of forced labor

KIBU shall not allow any form of forced, bonded or involuntary labor. All work must be undertaken voluntarily, never under threat or with any type of penalty or sanction.

The use of force/corporal punishment is prohibited.

As minimum, we will grant all the workers the right and freedom to:

- Work in our facilities,
- Interrupt their employment relationship at any time, respecting the notice period previously agreed to by both parties,
- To leave the workplace at the end of their workday,
- Not to deliver any personal documents or belongings to be held by the company,
- Not to pay, directly or indirectly, any monetary deposits of financial guarantees deposit or commission during the recruitment process,
- No to pay deposits nor have any delays in the payment.

No salary advances or loans will be offered to workers if they imply their indebtedness and link them to their work, or if they can entail a withholding of payments.

2. Prohibition of child labor and respect for underage persons

Neither **KIBU** nor its suppliers or related parties employ minors or exploit minors in any way. Minors are considered those persons who have not yet reached their 16th birthday. However, according to ILO Convention 138, if minimum legal working age is 14 years of age (exceptions allowed in developing countries) this may be allowed, provided that special protection measures are adopted.

Workers under 18 years shall not work during night hours, under hazardous conditions or under conditions that may put at risk said workers' health, safety, moral integrity, or that may harm their physical, mental, spiritual, moral, or social development.

Policies and procedures related to Child Labor shall comply with the requirements of the applicable International Labor Organization (ILO) Standards.



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The suppliers must support initiatives that promote the education and the improvement of the living conditions of the children of employees in those areas or countries in which the environment for them is not the most suitable.

3. Non-discrimination and equal treatment

All workers must be treated with dignity and respect. Suppliers must not tolerate or be involved in intimidation, bullying or abuse of any type.

KIBU will not tolerate, encourage, or be involved in any kind of discrimination with regards to workers based on age, beliefs, religion, political affiliation, gender, pregnancy/maternity, marital status, nationality, ethnic origin, race, caste, social class, health, disability, sexual orientation, membership of workers' organizations/trade unions or any other basis during recruitment and employment.

All workers, including contracted and sub-contracted, must have equal rights and social benefits. We and our suppliers must ensure equal opportunities for all workers in regard of hiring, payment, training, promotion, retirement, etc.

By means of the 'Company Committee' (workers' representative organization), the staff has the right and the opportunity of transmitting their needs, complaints, opinions, and suggestions for improvement to the Company management. All the communications will be considered for study.

All the information that may be of personal or professional interest to workers must be communicated to them in their own native language in case they do not perfectly understand the language of the country in which the factory is located. The Company will make all the possible efforts to ensure communication in those cases.

4. Respect for freedom of association and collective bargaining

KIBU commits to respect its employees' right to associate, join or form trade unions of their own choosing and to bargain collectively. The Company must not interfere with, obstruct, or put a stop to such legitimate activities. Likewise, we shall adopt an open and collaborative attitude towards the activities of trade unions.

Workers' representatives and trade union members shall be protected from any type of discrimination and shall be free to carry out their representative functions in their workplace.



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Where the right to freedom of association and collective bargaining is restricted under law, our suppliers must not hinder alternative means of ensuring a reasonable and independent exercise of such rights.

5. Safe and hygienic working conditions

We shall provide a safe and healthy workplace to our employees, ensuring minimum conditions of light, ventilation, hygiene, fire prevention and safety measures.

We must ensure safety and cleanliness in all work facilities and living quarters (when provided) and must follow clear procedures to regulate workplace health and safety.

We ensure access to potable water, and sanitary facilities for food storage are provided.

We shall take the required steps to prevent accidents and injuries arising from working activities or that may occur during working time by means of reducing, as far as is reasonably possible, the sources of danger inherent to the work environment.

Employees will be provided with appropriate and effective personal protection equipment.

Employees must have access to adequate medical assistance.

We must provide regular, recorded training for the workers (including management). This training must be reproduced for each newly hired worker (including those occupying posts of responsibility).

All the workers, including those occupying posts of responsibility, must have enough training in waste management, handling and disposal of chemical products and hazardous substances.

KIBU will designate a member of the management to oversee Health and Safety, who will be duly authorized and with the appropriate decision-taking power.

6. Remuneration and benefits

Work must be based on a recognized working relation in accordance with legislation and national practices and on international labor standards to ensure greater worker protection.

Frinsa must compensate its workers by means of wages, overtime pay, benefits and paid sick leave which will respectively comply with, or exceed, the legal minimum and/or the standards



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for each type of industry and/or its collective agreements, whichever is higher. Wages and compensation for normal working hours will cover the basic needs and constitute an additional source of income for the workers and their families.

KIBU must provide the workers with comprehensible written information about their working conditions, including wages, before they take up employment and, above all, details of their salaries for the corresponding payment period each time they are paid.

Deductions from wages as a disciplinary measure which are unauthorized or not provided for in national legislation shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

The following must not be used to elude obligations to workers specified in labor and social security laws, and regulations derived from normal labor relations: particular job or service contracts, subcontracting or home working agreements, apprenticeships without real intention to teach skills or provide regular work, excessive use of short-term contracts or any other similar systems.

KIBU must grant all workers those benefits required by law, including paid sick leave.

All workers must be paid for overtime worked at a higher rate than ordinary pay as required by law and, if applicable, by contractual agreement.

7. Working hours

KIBU shall establish working hours that comply with national law or with the collective bargaining agreement for the sector in question if the latter affords greater protection for the workers.

Overtime must be voluntary and must not exceed the maximum hours (per year) established by current and applicable legislation and shall be compensated at a premium rate. Overtime shall not be demanded on a regular basis.

KIBU must respect the right of all workers to rest during work shifts and to take at least the off days established by reference national law. Annual holidays and bank holidays must also be respected.

8. Business ethics



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8.1 Compliance with the law

Our company must comply with national and international regulations currently in force in the countries where operations are carried out.

8.2 Confidentiality

We shall keep the confidentiality of the information received from other parties because of our commercial relationship. Any information must be kept confidential from other clients or suppliers, whether current or potential.

The obligation of confidentiality will remain even if the relationship is terminated. Any material held by **KIBU** shall be returned to its owner once the relationship is terminated.

KIBU must comply with national and international legislation and agreements relating to intellectual property.

8.3 Bribery and Corruption

Direct or indirect payments or incentives offered to **KIBU** employees with a view towards influencing purchases or sales are forbidden. **KIBU** will never offer payments with this purpose either.

Any type of payment or incentive offered to public employees in exchange for any inappropriate or unfair advantage is forbidden.

9. Environmental protection and respect for local populations

KIBU, as well as its suppliers, must comply with the requirements of all local and international environmental regulations, including having the necessary administrative documents (licenses, permits et al.).

We must prevent contamination by means of a risk analysis and the adoption of suitable prevention methods.

We must minimize our activity's impact on the environment through an impact assessment study and the optimization of processes using the best available techniques.



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Suppliers must ensure that no human habitat or coastal area is illicitly affected, illegally transformed or re-zoned to favour the interests of individuals or private business to the detriment of the community.

Suppliers must make sure that those responsible for the management of industries, factories, farms et al. localized in third countries³ communicate using the national language.

10. Sustainability of the marine resources

Our suppliers must guarantee the reliable information about the origin, the sustainability, and the legality of raw materials in accordance with current European legislation.

In the case of fish products, **KIBU** commits to comply with the specific EU requirements pertaining to Illegal, Unregulated, Unreported (IUU) fishing.

Our tuna suppliers comply with Dolphin Safe criteria and must be listed in the positive list of Dolphin Safe companies published by the Earth Island Institute (EII).

Suppliers must have a public *anti-shark finning* policy in place.

Tuna suppliers must source raw materials or products in accordance with International Seafood Sustainability Foundation (ISSF) conservation measures and commitments.

Our suppliers must make all possible efforts to avoid fishing during spawning periods to allow the reproduction of fish stocks in a natural way.

NOTES

None of the provisions included in this declaration may be taken as an exemption from complying with obligations imposed by national or international law, provided that national or international legislation imposes stricter requisites concerning respect for the principles and fundamental rights of workers, protection of the environment and ethical principles.

1) **KIBU's** Code of Conduct is based on standards set down in the following ILO Conventions and Recommendations: Convention 29 and 105 and Recommendation 35 (Forced labor); Convention 138 and 182 and Recommendation 146 (Child labor. Minimum Age); Conventions 87, 98 and 143 (Freedom of Association and Protection of the Right to Organize. Workers' representatives); Conventions 100 and 111 (Equal Remuneration, Holidays with Pay); Recommendations 90 and 111 (Equal Remuneration, Discrimination); Convention 155 and Recommendation 164 (Occupational Health and Safety); Conventions 94, 95, 100 and 131 (Labor Clauses. Protection of Wages. Equal Remuneration); Convention 188 concerning work in the fishing sector.



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2) The term “supplier” must be applied to suppliers themselves, subcontractors, concessionaries and any external processors.

3) The term “third countries” refers to those countries in which a company establishes a production base or undertakes any type of business. These countries naturally have a culture and, sometimes, a language different from those of the parent company.

Copies of the ILO Conventions and Recommendations are available at www.ilo.org