

# Code of Ethics and Conduct



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## OUR PURPOSE:

At TASA we are committed to a purpose that motivates us every day to give the best of ourselves. It is our reason to exist. Thanks to this not only we enrich the world with marine ingredients of high quality. We also enrich the life of our human team, the quality of our environment and the quality of life of the communities where we have activities.

Our purpose is:

***We guarantee tomorrow's nutrition.***

## Our Values



### SAFETY AND SUSTAINABILITY

- ✓ I take care of myself and my colleagues considering that safety is the priority.
- ✓ I generate a positive impact on society, working with integrity and being responsible to stakeholders of my surroundings as well as the environment.



### FOCUS ON PEOPLE

- ✓ I ask for and give constant feedback that allows me to be better.
- ✓ I act with respect and communicate with transparency.



### EXTRAORDINARY RESULTS

- ✓ I keep what I promise.
- ✓ I learn from my mistakes and improve.



### EXCELLENT OPERATION

- ✓ I seek continuous improvement to achieve the best quality and efficiency.
- ✓ I carry out my activities planning properly.



### TEAMWORK

- ✓ I act always thinking of the best for the organization, not just in my area.
- ✓ I am proactive and anticipate the needs of my area and other areas.

## Message from the **General Manager**



**Gonzalo**  
**De Romaña**

Dear collaborators,

At TASA, integrity must be the basis from which all our actions start. Ethics must guide our day to day, only then, can we be sure that our decisions are the best.

A company without a solid ethical culture is not sustainable, since without it, relationships with collaborators, clients, suppliers or any other interest group cannot be built. Ethics is key, not only for the internal functioning of the organization, but also to form a distinctive feature of TASA's identity that strengthens our reputation.

In order to accomplish this, we have updated our Code of Ethics and Conduct, including the new guidelines of the Breca Group on issues of transparency and integrity in our actions.

I am sure that the fulfillment of this code will generate a feeling of pride in all the goals that we achieve together.

Cordially,

A handwritten signature in black ink, appearing to read 'GDR-71'.

**Gonzalo De Romaña**  
General Manager

## Understanding the Code of Ethics and Conduct

### ABOUT THE CODE OF ETHICS AND CONDUCT AND THE COMPLIANCE COMMITTEE

The Code of Ethics and Conduct describes how we work and behave. Its content reflects our values and summarizes the fundamental beliefs of TASA. It also incorporates guidelines from our business group, Breca.

The Compliance Committee of the Code of Ethics and Conduct is responsible for ensuring compliance with the Code of Ethics and Conduct among all its collaborators. The Committee is made up of five members:

- General Manager
- Human Management Manager
- Legal Manager
- Internal Audit Manager
- Central Manager of Administration and Finance

It is also the responsibility of the Committee to take actions in the event of breaches of the Code, and to prevent their recurrence. In order to do so, the Committee analyzes, evaluates and decides on possible breaches of the Code that are received through our Integrity Channel.

The sanctions will be applied by the Human Management Department at the request of the Compliance Committee, the current legal regulations and the right of defense of the offender.

### SCOPE OF THE CODE OF ETHICS AND CONDUCT

The behaviors included in this Code are mandatory for all TASA employees.

Regardless of position, geographic location or level of responsibility, all of us who work at TASA are responsible for ensuring our integrity and applying the Code.

This Code is not intended to cover all possible situations that may arise in the workplace but establish minimum standards of conduct that should guide all employees in their way of acting during their activities.

All TASA, employees are responsible for having a clear understanding of the Code and for upholding our commitments annually.

Furthermore, we hope that our suppliers, ship owners, customers and third parties with whom we do business, adopt similar standards.

# Commitments to our stakeholders

## COLLABORATORS

### 1.1 Diversity, equal opportunities and respect

- We value cultural plurality and diversity. We respect each other mutually and we seek to maintain an inclusive environment free of discrimination, intimidation and harassment. Verbal or physical harassment is not accepted under any circumstance.
- We treat our collaborators with respect, dignity, justice and courtesy. Sexual harassment and harassment are not tolerated at TASA.
- We cultivate and foster team spirit. We build relationships with each other based on shared trust, with the assurance that each of us has a personal and professional commitment to do the right thing.
- We are committed to open and honest communication.
- We consult each other and value the prospects of who differ from us, as well as of those who question our own point of view.
- We respect our work environment and our collaborators, and our behavior is directed to taking care of TASA's reputation and good image

- We promote the search for professional growth of our collaborators, and we promote meritocracy and continuous learning.
- We maintain a healthy distance between our work and personal relationships (parents, siblings, spouse or partner and children). We report the cases in which our relatives work or do business with TASA.

### 1.2 Safe and healthy environment

- We value the life and integrity of people the most, and we promote a culture of safety based on prevention.
- We make sure to maintain a safe and healthy work environment for our collaborators and visitors. Nothing justifies putting physical integrity and health at risk.
- We always act in compliance or exceeding the safety and health standards applicable to the fishing sector.
- We care about sharing and requiring our suppliers, customers and visitors the necessary safety and health measures, and we supervise their compliance.
- We act and promptly report risks or accidents to implement the necessary measures in a timely manner.

- We perform our functions at an acceptable level and avoiding the consumption of drugs or alcohol.

### 1.3 Human rights

- We do not tolerate any form of work that is done in an involuntary manner, under threat, intimidation and / or other manipulations.
- We respect the dignity of individuals and the right of their collaborators to associate with any group and to bargain collectively.
- We guarantee the safety and health of our collaborators, contractors and third parties preventing accidents at work and occupational diseases.
- We do not tolerate or support child or youth labor. All contracts include only people who are over the age of 18.
- We guarantee that all our collaborators work in accordance with the laws and mandatory standards of the sector related to regular working hours and overtime, salary payment, social benefits and comprehensive social security.
- We create an environment of equal working conditions and treatment towards all our collaborators, without effecting or sponsoring any type of discrimination based on race, color, religion, sex, age, physical capacity, nationality, sexual orientation, political affiliation, union affiliation, medical examinations, among others.
- We do not evade labor obligations through subcontracting, or through the excessive use of fixed-term contracts.
- We do not tolerate any form of psychological, physical, sexual or verbal abuse, intimidation, threat or harassment.
- We avoid environmental pollution through the identification, measurement and management of environmental aspects and impacts.
- We work ethically, without bribery, corruption, or any other type of fraudulent business practice, always offering our collaborators and partners an ethics channel to report concerns or illegal activities in the workplace without threats of retaliation, intimidation or harassment.

## SHAREHOLDERS

### 2.1 Responsible use of delegated authority

- We value the independence of thought and protect the trust placed in us by the shareholders and their directors, committing ourselves to act and make decisions in the genuine best interest of TASA and its stakeholders, within the framework of ethical behavior and according to law .
- We respect and comply with the policies, procedures, and controls applicable to our responsibilities, and we seek their continuous



improvement over time. Policies and procedures are specific and may go beyond the requirements of the law.

- We are committed to protecting TASA's reputation, assets and ethical culture, for which we take measures to prevent risks and sanction irregular acts.
- We carry out our work with professionalism and objectivity to timely identify and report signs of internal or third-party activities that could harm TASA.
- In the case of a situation that puts TASA at risk, we consult with Senior Management before acting, therefore avoiding exceeding the authority delegated to us.

## 2.2 Integrity of financial reports and operational reports

- We ensure the timely, complete, correct and precise registration of transactions and operations, in order to report adequate information for decision-making. Financial records must be accurate and in accordance with accounting principles.
- We take appropriate measures for the preservation and security of our records.
- We are committed to presenting financial, social, environmental or other reports in a timely manner that fully, transparently and honestly reflect our situation in order to preserve the confidence of

shareholders and stakeholders.

## 2.3 Protection of reserved information and intellectual property

- We are committed to protecting TASA's confidential information and the personal or confidential information of our collaborators, clients or third parties, in accordance with the laws and professional judgment.
- We contribute to maintaining fair and open financial markets, being transparent and timely in the disclosure of relevant information.
- Confidential information is information that is not public knowledge and includes, but is not limited to, strategic projects, business plans, commercial information, engineering drawings, manufacturing processes, product recipes, designs, databases, client lists and vendors, records, salary information and any other unpublished financial or other information.
- We are committed to preventing the use of privileged information for purposes other than those of TASA, for personal or third-party benefit.
- We safeguard the information or material protected by property rights, and we protect the intellectual capital of TASA and third parties. We are careful before reproducing or distributing information through printed or electronic means.

- We ensure the proper use of the TASA identity signs and symbols, as we understand that they reflect who we are and how we work.
- To the extent permitted by the applicable law, TASA reserves the right to control and inspect the way in which the employees use their assets and company information, including the right to inspect all emails, data, and files maintained on company equipment or network.

## 2.4 Transparency and integrity in our actions

- We protect and use TASA's resources and assets responsibly, efficiently and appropriately.
- We carefully evaluate our commitments and relationships, and we act with transparency and loyalty to TASA, and its shareholders, avoiding conflicts of interest, whether potential, real or apparent.
- A conflict of interest occurs when a collaborator's personal interests compete with TASA's interests, and includes, but is not limited to:

- *Benefiting directly or indirectly from transactions involving TASA, through natural or legal persons linked to the collaborator, his family, or third parties who share an interest or benefit with the collaborator.*
- *Being a consultant, director, executive or collaborator, or*

*have a financial interest in a supplier, client or possible competitor of TASA.*

- *Receiving improper or unauthorized personal benefits as a result of the use of TASA's property or services.*
- *Attending courses and trips paid by suppliers without technical justification or approval of the Compliance Committee.*

- We avoid receiving or granting gifts or entertainment greater than \$ 100 USD, which may be perceived as improperly influencing the decision of the recipient, or that go against legal regulations. Any exception must be approved by the Compliance Committee of the Code of Ethics and Conduct. In the case of gifts or hospitality to public officials, an approval of the Compliance Officer must be granted.
- We are committed to the responsible and reasonable use of travel and representation expenses, as this has an impact on TASA's profitability and reputation.
- We report our expenses accurately, completely and reliably, and we collaborate openly with the corresponding review processes.

## 2.5 Company representation and reputation protection

- We contribute responsibly and proactively to improve TASA's

image and reputation. We reject fraud, corruption and any dishonest conduct. We do not attempt to influence nor allow ourselves to be influenced through favors or any conduct that appears to be a bribe or attempted bribery.

- We act according to internal policies to represent TASA, both internally and externally.
- We act prudently and responsibly when selecting collaborators, suppliers, clients and strategic partners, evaluating the level of economic and reputational risk, and applying due diligence confirmation procedures.
- We understand that in our activities we are representatives of TASA and, consequently, we act responsibly and operate with a professional and appropriate attitude.
- We are committed to monitoring the conduct of our partners, agents, suppliers and especially those who act on behalf of TASA in front of the State or third parties, to verify that they understand and comply with our ethical guidelines.
- We develop relationships with our partners based on trust, transparency, truthfulness, mutual respect and maintaining a long-term vision. "We do not earn from our partners, but with our partners."
- We are committed to maintaining the trust and fidelity of our customers through the delivery of quality marine products and ingredients, and the transparent disclosure of adequate information that allows them to make informed and responsible choices.
- We recognize the importance of our suppliers to achieve our goals.
- We are transparent, truthful, fair and careful in our negotiation, selection and exchange processes.
- We compete vigorously and honestly, based on ethical principles, and in full compliance with the legal norms that regulate the markets.
- Trade policy and prices will be established independently and will never be agreed, formally or informally, with competitors or other unrelated parties, either directly or indirectly.
- Customers will never be distributed within TASA and its competitors, they will always be the result of fair competition.
- Those of us who are dedicated to the commercial and logistical activities care about being familiar with sound market practices. We do not carry out any act that is intended to hinder, restrict or distort competition, in accordance with our position in the market.

## CUSTOMERS, SUPPLIERS AND COMPETITION

### 3.1 Market Integrity

- We treat our partners, customers and suppliers with respect and dignity. We honor our promises, agreements and commitments.

- We seek that the commercial opportunities that are presented to us benefit TASA, unless TASA has expressly abandoned its interest in pursuing mentioned opportunity.

**ALWAYS**

- ▶ Maintain a relationship of trust with our clients and collaborators.
- ▶ Deliver our promises, agreements and commitments to both our clients and our suppliers.
- ▶ Compete transparently and ethically with other companies in the market, in respect of the competitive process.
- ▶ Maintain a high-quality standard to deliver a product of value to our customers.

**NEVER**

- ▶ Take advantage of our clients or suppliers through actions that are not in accordance with our values.
- ▶ Offering, paying or accepting bribes or acting dishonestly to win clients or contracts. Corruption is not tolerated at Tasa and is prohibited.
- ▶ Carry out anti-competitive practices, including the creation of cartels or horizontal and / or vertical collusive practices and, in the event of having a dominant position in the market, try to abuse of it.

## COMMUNITY, ENVIRONMENT, STATE AND MEDIA

### 4.1 Good relationships and investment in our communities

- We recognize our responsibility as members of companies that play an active and positive role in supporting a dignified and sustainable society.
- We do not seek to replace the State; however, we are sensitive to particular situations or vulnerabilities in our environment.
- We promote open, sincere and mutually beneficial relationships with the societies or communities in which our operations are carried out.
- We act in a socially responsible way, within the laws, customs and traditions of the areas where we operate, contributing to their sustainable development.
- We have a firm commitment to the respect of human rights, and we do not participate in businesses that go against them.

### 4.2 Protection of the environment

- We understand the importance of the environment for current and future generations and the sustainability of businesses. Therefore, we are committed to developing environmentally sustainable activities and complying with the laws and regulations applicable to our businesses.
- We promote a culture of

environmental protection and efficient use of resources.

- We seek solutions and develop technologies or practices that help minimize the impacts of our operations on the environment.
- We are diligent in identifying and developing the implementation of appropriate actions to prevent, control or correct conditions related to environmental risks.
- We value interacting with business partners who maintain good environmental standards.

### 4.3 Compliance with laws and regulations

- We comply with applicable laws, regulations, and standards. Furthermore, we respect the provisions of the Internal Labour Regulation and the right of defense of the offender.
- We promptly report to appropriate internal authorities any suspicion of non-compliance or irregular acts by our collaborators or third parties with whom the company is related.
- We always act with integrity. Corruption, receipt or payment of bribes in interactions with entities or people in the public or private sphere, both directly and through third parties, are unacceptable.
- We are committed to preventing money laundering and terrorist financing.
- We support local and international efforts to prevent illegal activities. Relationship with public officials and political contributions

#### 4.4 Relationship with public officials and political contributions

- We respect the authority of public entities and officials wherever we conduct our business, and we maintain honest and ethical relationships with them.
- We provide accurate, timely, and appropriate information to the State and regulatory agencies, and we understand that errors or omissions can harm TASA's reputation and credibility.
- We are especially careful in our interactions with public officials and candidates for public office, in order to ensure that our actions comply thoroughly and properly with the guidelines of this code.
- We seek to develop our activities without influencing, conditioning or interfering in political pluralism.

#### 4.5 Relationship with the media

- We engage with the media in an effective, timely, truthful, and consistent manner, through formal channels established for this purpose.
- We respect freedom of the press and of expression.
- We value the role of the media as shapers (influencers) of public opinion.

If we are managers, assistant managers, captains, superintendents, bosses or supervisors, or if we occupy a position of trust, we must lead with integrity, led by example on a day-to-day basis and help the Compliance Committee maintain a high standard of conduct and ethics at TASA.

To demonstrate our commitment, we must:

- Continuously strengthen compliance of the Code with our team.
- Ensure that our team understands the Code and complies with its requirements within the daily activities of the company.
- Respond directly and seriously to the doubts or queries of our team.
- Be an example in continually maintaining consistency between our words and our actions.
- Encourage and ensure the participation of our team in training programs related to understanding the Code.
- Recognize and motivate collaborators to act following the values of TASA and the principles contained in the Code.
- Foster an environment of trust and communication so that collaborators can channel their queries and concerns in open dialogue.
- When ethical issues come to our attention, we have a special obligation to report these concerns through the Integrity Channel.
- Take actions in case of breaches of the Code, therefore preventing similar situations from happening again.

**ADDITIONAL COMMITMENTS  
FROM HEADS**

**ALWAYS**

- ▶ Comply with the laws and regulations applicable to TASA.
- ▶ Promote mutual benefit with the communities where we operate.
- ▶ Work with environmental care in mind.
- ▶ Report any potential breach of the Code of Conduct and Ethics.
- ▶ Respect free press.
- ▶ Report potential warning signs or suspicious situations related to bribery, money laundering, terrorist financing, carrying out competitive acts or other illegal conduct.

**NEVER**

- ▶ Perform acts of corruption, receive or pay bribes or favors to obtain any benefit.
- ▶ Benefit from harming the environment or the communities where we operate.



## Ways to consult or communicate concerns

If you have a question or concern, or consider that the behavior of a collaborator violates the Code, it is your obligation to immediately report this information, therefore preventing the issue from becoming a more serious problem.

It is not necessary to be directly affected by a breach of the Code. We (still) have a responsibility to report any concerns or situations that we perceive or identify during our daily work.

In these cases, you have the following alternatives:

- Talk to your immediate Line Manager.
- Report it to the Compliance Officer.
- Consult with a member of the Compliance Committee.
- Report it through the Integrity Channel.

- We require your help to become aware of the case and to evaluate in order to take appropriate action.

### OUR INTEGRITY CHANNEL

The Integrity Channel is a service created to support you and facilitate the resolution of queries and doubts about compliance with the Code of Ethics and Conduct. Any communication will be treated fairly, professionally and confidentially. If you wish, you can remain anonymous.

TASA prohibits any form of punishment or retaliation against anyone who reports or helps identify situations that represent a breach of our Code of Ethics and Conduct.

### ACCESS TO THE INTEGRITY CHANNEL

You can access the TASA Integrity Channel through:



<https://www.canaldeintegridad.com/tasa/>



[tasa@canaldeintegridad.com](mailto:tasa@canaldeintegridad.com)



By phone Monday through Friday from 8:30 a.m. at 6:30 p.m. at 0-800-1-8114 code 2013 // 219-7104 code 2013



Communication to Ernst & Young at the address Av. Víctor Andrés Belaunde 171, 6th Floor, San Isidro, Lima 27, Lima - Peru; with Attention to Mr. Rafael Huamán and placing in the reference: Integrity Channel and the name of the company.



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