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Code of conduct for suppliers of products and services to the Group Conservas Garavilla

1. Introduction.

The Group Conservas Garavilla (hereinafter GCG) is one of the leading companies in the manufacture and distribution of marine-derived food products, with famous and recognized brands such as *Isabel* and *Cuca*. As explicitly stated in its quality policy, GCG has committed to meet the needs and expectations of our customers and consumers by providing safe and quality products.

MISION

Group Conservas Garavilla is fully committed to achieving the following strategic objectives:

- To ensure the long term viability of our organization maximizing the value of shareholders' investments while adapting to changes that are continuously required by the different markets.
- To place the GCG as a reference in the food industry to make available safe and healthy products for our costumers, with the best value for money of the market and that fully meet their needs and expectations.
- To provide our customers with reliable products, tasty and fun, they form a small part of their lives and intimate moments with family and friends.
- To monitor and improve our production processes continuously; to develop and offer to our customers innovative products that meet the highest international standards of quality and food safety.

VISION

Group Conservas Garavilla is identified with the following principles:

- To be a socially responsible, efficient and competitive company committed to safety, health, environmental care and sustainability of marine resources, which are the source of our business, and their habitat.
- To be a leader in the Spanish market and global projection, aimed at creating value for society, customers and employees.
- To be the best alternative for the supply of safe, healthy, tasty and innovative food, manufactured always respecting the ethical standards governing human and trade relations.

VALUES

This values represent the identity of Group Conservas Garavilla as a organization. The values that govern our actions and guide our decisions are:

- We believe in people. We ensure the opportunities of development based on merit and personal contribution.
- We encourage teamwork. We seek participation and communication between all toward a common goal, sharing information and knowledge.
- We behave with integrity. We firmly believe that the company's business should be based on ethical conduct, straight, and head of all those who are part of the organization.
- We strive for excellence. We work in a rigorous and transparent manner focusing our efforts on customer satisfaction and the achievement of the objectives of the business project.
- We offer safe, healthy and innovative products to get the trust and affection of our customers and consumers.
- We commit ourselves socially and culturally with the community and adapt our business strategies to care for the environment and the preservation of marine resources and their habitat.

GCG considers extremely important, as an active agent in the sector of the processing seafood industry, to behave as expected for a socially responsible organization. Therefore, we strive every day in conducting all the activities carried out in our facilities and those of our partners and suppliers with the utmost respect and consideration for human rights, ethics that should govern human and trade relations, respect for the environment and concern for the sustainability of resources.

From the perspective of our customers and consumers of our products we are responsible, from extraction of the sea until they reach their hands, for the entire value chain of the products we offer. It is, therefore, essential for us to get to place their trust not only on our products but also on our values and attitudes.

This Code of Conduct for Suppliers of GCG is based, inter alia, in: the Declaration of Human Rights of the United Nations, the ten (10) principles of the Global Compact of the United Nations to promote corporate social responsibility, the OECD Guidelines for Multinational Enterprises, the Conventions and Recommendations of the ILO on child labor and working conditions, the Code of Conduct promoted by FAO for Responsible Fisheries and the requirements of the 'International Seafood Sustainability Foundation' (ISSF) for the sustainability of marine resources and their ecosystem. The minimum requirements that are required to our suppliers of products and services will always comply with the legislation applicable to them within the scope of its activity, both locally and internationally.

The Code of Conduct adopted by our company is a basic outline that describes what GCG considered an acceptable and responsible behavior. However, it not intended to become a comprehensive framework for action so that both GCG and its partners must commit themselves to make continuous efforts to reach new heights and achieve sustainable development of our activities contributing, as far as we can, support for achieving social goals and bequeath decent environment for future generations.

2. Raw materials. Sustainability of resources.

Fisheries, including aquaculture, provide a vital source of food, employment, recreation, trade and economic welfare of people throughout the world, both for present and for the future and, therefore, these activities should be carried out responsibly. GCG suppliers undertake that:

- ✓ **All fish and other marine products should be captured, brought to earth, grown and processed with absolute respect for the law enforcement and such activities must be inspected by the competent local authorities in the field.**
The right to fish carries with it the obligation to do so in a responsibly way to ensure the conservation and effective management of living aquatic resources.
- ✓ **All raw materials must be traceable to their source, to which our suppliers must have implemented (and verified) a system to ensure that traceability.**
- ✓ **Endangered marine species appearing in Annex I of the Convention on International Trade in Endangered Species of Fauna and Flora (CITES) shall not be used.**
- ✓ **The use of fish and other marine products shall be evaluated in accordance with the recommendations of local and national authorities, regional fisheries management organizations (RFMOs) and the Department of Fisheries and Aquaculture of the FAO on sustainability of fisheries.**
- ✓ **Application of destructive fishing methods such as the use of dynamite or toxic will not be tolerated under no circumstances,.**
- ✓ **Earth Island Institute certificates are required to ensure that the fishing methods do not harmful to dolphins.**
- ✓ **We are committed to improve traceability and stop illegal fishing (IUU): no establishing business relationships with companies involved in illegal fishing episodes, which even have got a single vessel on the IUU list of the European Union or other official list of the RFMOs.**

As an active member of the 'International Seafood Sustainability Foundation' (ISSF) since 2010, GCG commits itself to assure that both its fisheries policy and all acquisitions from third parties comply with the recommendations issued by the ISSF. We agree with the ISSF the convenience of a scientific and comprehensive approach, respecting the indications emerging from the most recent updates on the status of fisheries (www.iss-foundation.org) and its resolutions. In particular, GCG complies with the following statements and, therefore, its suppliers are committed to:

- **Do not practice offshore transshipment or keep business relationships with companies that make, protect or defend such practices.**
- **Prohibits any activity involving mutilation of live sharks for exclusive commercial use of their fins ("shark finning"). Effective in September 1, 2012 will not enter / cut off trade with any company that has not issued a public policy which expressly prohibits this activity.**
- **Favors the creation of a single global list of fishing vessels based on the number UVI (Unique Vessel Identification) issued by the International Maritime Organization (IMO) and, since June 2011 only buy tuna from vessels that have got that identification number (with the exception of products from artisanal fisheries whose fishing cannot access such registration).**

Finally, GCG endorses the "Guide to good practice of the tuna purse seine freezer fleet" proposed by the OPAGAC / AGAC of which GCG forms part.

Food safety and product quality

As it is evident in the Quality Policy undertaken by our organization, safety and quality of the products we offer is a strategic priority for GCG. In connection with GCG suppliers this means that:

- **Every product or service must be strictly managed undergo the criteria set out in the purchase agreement.**
- **GCG requires its suppliers that must be authorized to carry out their activities by local authorities and, where appropriate, the establishments must be approved for export to the European Union, they must appear on the official lists of approved establishments by the Directorate-General for Health and Consumer Protection of the European Commission (DG-SANCO).**
- **The implementation of certified management systems for food security will be highly valued, encouraging all our suppliers to take this path.** GCG will conduct periodic evaluations of our supplier facilities and procedures to guarantee the final quality of the products we produce and to verify that our partners take into account criteria of continuous improvement in all their activities. Companies that agree to undergo the homologation supplier process established by GCG must accept all the audits required by GCG in the scope of food safety and / or social responsibility.
- **All suppliers must ensure that the products supplied to GCG are safe and that the content of contaminants and undesirable substances potentially present are below the legislated limits¹.**

¹ Reference is assumed to European legislation on contaminants possibly present in food. The core corpus is given by the so-called "hygiene package" consisting of, among others, by Regulation (EC) 852/2004 Regulation (EC) 853/2004 and Regulation (EC) 854/2004 of 29 April. Regulation 2073/2005 of the Commission of 15 November 2005 on microbiological criteria for foodstuffs and Regulation (EC) 1881/2006 of the Commission of 19 December 2006 fixing maximum levels for certain contaminants in foodstuffs. In any case, it is the provider's responsibility to guarantee that the products they provide meet all the criteria required by the applicable European legislation.

3. Environment and environmental policy.

It will be highly appreciated that our suppliers display a high degree of environmental awareness and that this will result in a clear effort to minimize the impact their activities may have on the environment. They are encouraged to take all measures in their hands, not only tending to minimize the negative environmental impact, but to move towards improving their environmental conditions.

GCG encourages its providers to adopt and assume a documented environmental policy and to establish action plans to cover the most important aspects of its business which could adversely affect the environment.

4. Ergonomics and work environment. People.

- **The use of forced labor by a supplier will not be tolerated under any course. Every worker must take his place on a voluntary basis and should have secured decent contractual terms.**
- **It will be not tolerated under any assumption the use of children labor.** GCG assumes the defense of the children and the child's right to receive a decent education. Special attention should be paid to workers under 18 in regard to the number of hours worked and the type of activity.
- **Workers should be entitled, without any restrictions, to freedom of association and to membership of legal organizations that represent their interests as employees. The employer must respect the right of employees to collectively negotiate the terms of their partnership.**

- **All workers, including temporary ones, must be legally recruited in accordance with agreed contractual conditions.** Agreed working conditions and wages must be at least those established by local law enforcement for the sector. The maximum number of hours and days off work must comply with the provisions of the implementing legislation. Workers must have at least one day off every seven days of continuous work. However, exceptions may be permitted during certain periods such as during the harvest. Workers should be entitled to vacation and, as appropriate, justifiable absence permits granted by the company without incurring negative consequences or unilateral termination of the employment relationship by the employer.
- **All workers should be treated with respect regardless of gender, religion, sexual orientation, race or geographic origin, political belief, age or disability.** It is the responsibility of the suppliers of GCG to ensure that communications with their employees are understandable to them, using the language commonly used by the worker.
- **The working environment must be safe.** Measures should be taken to prevent occupational hazards. GCG partners are encouraged to establish action plans for continuous improvement of the working environments. Actions plans and protocols should be established to ensure appropriate care for affected workers when needed.

5. Trade Relationships between members of both organizations.

GCG has adopted very stringent requirements in terms of honesty and integrity in our internal relationships and expect the same level of demand in relations with our foreign partners and suppliers.

- **Gifts, privileges or other benefits should not be offered to GCG staff counterpart for the establishment of trade agreements.**

To give permission to GCG staff or their representatives for verifying the full compliance with this Code of Conduct will be a necessary precondition for the establishment of trade relations between GCG and any supplier.

Providers may be required to report to GCG about their businesses relationship with any subcontractor related at any level with the products or services contracted by GCG. It is the supplier's responsibility to guarantee that these subcontracted suppliers know and apply this Code of Conduct.

THE HIGH MANAGEMENT
October 2015

TO BE COVERED BY THE SUPPLIER:

By signing this document, we accept the conditions stated in the Code of Conduct of Group Conservas Garavilla, S.L.

Company:			
Name:			
Position:		Date:	
Signing:		Stamp:	