

ETHICAL GUIDELINES

FOR



PELAGIA[®]

Our Vision



Our Values

Dynamic – to manage constant changes

Innovative mind-set

Ownership by encouraging initiatives and accountability

Direct communication and “hands on” mentality

Creating *Trust* in all our relations

1 INTRODUCTION

- 1.1 The purpose of these guidelines is to lay a foundation for a healthy corporate culture, and to preserve integrity of the Company by motivating employees to promote standards of good business practice. The guidelines are also intended to serve as a tool for self-evaluation and further development of the Company's identity.
- 1.2 The guidelines apply to all employees of the Company and all those acting on behalf of the Company.
- 1.3 Following the ethical guidelines is an independent responsibility of every individual. The Company's management is responsible for ensuring the rules are complied with.

2 PERSONAL BEHAVIOUR

- 2.1 Company policy requires that the Board and employees perform their obligations to the Company with a high degree of ethical standards and personal morality. This means that the Board and employees of the Company are expected to act fairly, honestly, properly, professionally and with integrity in interactions with other employees, business associates, customers, the public, business community, shareholders, suppliers, competitors and government authorities.
- 2.2 Directors and employees shall not use information they have gained through their association with the company to achieve unfair advantages. Including misuse of confidential information, manipulation, concealment or other fraudulent practices.
- 2.3 The Company operates with zero tolerance for any form of discrimination against employees, shareholders, directors, customers and suppliers on the basis of ethnicity, nationality, religion, age or gender.
- 2.4 Directors or employees must not violate applicable law or Company policy on the basis of loyalty or a desire for profitability.

3 VALUES

- 3.1 The Company strives to be a reliable partner by acting consistently at all levels; predictable deliveries, high service and offer products and solutions of consistently high quality.

- 3.2 The Company should act proactively in the face of new challenges and always meet obligations as swift and as appropriate manner possible.
- 3.3 The Company will work actively to utilize the available expertise and resources. The Company shall consider customers and suppliers as partners.
- 3.4 The Company shall utilize knowledge in manufacturing, product development and management to ensure continuous improvement of «best practice» in these areas.

4 LAWS & REGULATIONS

- 4.1 The Company shall comply with applicable laws, ruler and public order of the country it operates in. It is the Board members and the employees' personal responsibility to comply with the standards and restrictions that apply, including those relating to accounting and auditing matters and internal rules (as long as these do not conflict with applicable law).

5 WORKING ENVIRONMENT

- 5.1 The Company shall facilitate a positive workplace with an inclusive working environment.
- 5.2 The Company does not tolerate conduct that may be perceived as threatening or demeaning.
- 5.3 Employees must treat each other with respect and provide a work environment free of discrimination and harassment on the basis of religion, gender, sexual orientation, age, nationality, race and disability.
- 5.4 The Company shall have a continuous focus on ensuring a safe and injury free workplace.
- 5.5 The company will strive to ensure that modern slavery or human trafficking does not take place within our business or supply chain. Modern slavery includes slavery, social dumping, human trafficking, forced labour, child labour and other forms of gross exploitation of people. Pelagia has a zero-tolerance approach to all forms of modern slavery, and does not want to have any relationship with businesses or people who expose humans to such gross exploitation.

6 RELATIONSHIP WITH CONTRACTUAL PARTNERS, COMPETITORS & PUBLIC AUTHORITIES

- 6.1 Contract parties shall be met with insight, respect and understanding.
- 6.2 Suppliers shall be treated openly and in a professional manner.
- 6.3 The Company shall have an appropriate and open dialogue with public authorities.
- 6.4 The Company and its employees shall not under any circumstances take part in actions that are contrary to applicable competition laws.
- 6.5 The Company has zero tolerance for corruption. Employees shall not accept illegal or inappropriate gifts, payments or benefits on behalf of themselves or the Company. The Company or its employees shall not offer gifts or bribes that are illegal or likely to influence the recipient's integrity.
- 6.6 The Company and its employees shall not take part in any action that facilitates money laundering. The Company is responsible for taking the necessary precautions to prevent the Company's transactions may be used by others in laundering purposes.

7 PRICE & TAX

- 7.1 The Company's internal pricing is determined according to the principle of «arm's length», which means that the Company operates its subsidiaries as independent companies. Treating subsidiaries as an independent party simplifies accounting and tax issues in the various units.

8 LOYALTY, CONFLICTS OF INTEREST & CONFIDENTIALITY

- 8.1 Employees must be loyal to the Company and must therefore refrain from actions or interests that make it difficult to be objective in the exercise of their work.
- 8.2 If an employee is in a situation where he/she has a direct or indirect material interest in any transaction or other matter which the Company is a party, he/she undertakes to inform his superiors or the board about this.
- 8.3 Conflicts of interest involving customers, suppliers, contractors, present or prospective employees, competitors, owners and other compounds, the employee shall notify his superiors about the conflict. As far as practicable possible conflicts of interest shall be avoided.



- 8.4 Employees should be aware of their confidentiality and exercise caution when discussing internal affairs to avoid that outsiders overhear the discussion.
- 8.5 Major issues from media should be directed to CEO.

9 SUSTAINABILITY

- 9.1 The Company contributes to sustainable development in the pelagic business by at all times complying with applicable regulations in the industry, as well as working diligently to protect the environment. It is the employee's responsibility to familiarize themselves with the environmental effects that their functions have on the nature and use environmentally friendly solutions wherever practically feasible.

10 PRIVATE INTERESTS & EMPLOYEE ACTIVITIES

- 10.1 No employee of the Company shall hold another position or carry out work for others during working hours without prior written permission from their manager.
- 10.2 Positions on boards and organizations as a result of employee's position in the Company must be clarified with the manager. Remuneration resulting from trusted positions will generally accrue to the Company unless otherwise clarified.

11 GIFTS & ADVANTAGES

- 11.1 Employees in the Company shall not accept or give personal advantages or gifts that can affect actions or decisions. The ban also applies to invitations, tours or participation in events with suppliers or business associates without prior permission from their manager.
- 11.2 Gifts received at work cannot be taken privately. They accrue to the Company and are recommended for use in social events.
- 11.3 There is a ban on private withdrawals of bonus points. Employees are not permitted to use any bonus points earned in connection with business travels for private use. This applies, among other things, but is not limited to, bonus points from airline companies, hotels, etc.

12 SOCIAL MEDIA

- 12.1 All employees are the ambassadors of the Company. Therefore, every individual has an independent responsibility to help ensure that the Company's competitiveness, trust and reputation are safeguarded. Employees who are active on social media should act as good representatives of the Company.
- 12.2 It is important that you clarify that you do not talk on behalf of the company, if there is any doubt about your role. Employees have freedom of expression, but confidentiality also applies to social media.

13 CONTROL, WARNINGS & SANCTIONS

- 13.1 The Company should periodically ensure that all aspects of the ethical guidelines are followed. Employees must ensure that they know and perform their duties in accordance with the requirements specified in this document and applicable laws and regulations. Managers must ensure that activities within their remit performed according to the requirements specified in this document.
- 13.2 Policy violations or blameworthy conditions should be notified to the manager. Where this is not possible, the Company management, or possibly the board, should be notified.
- 13.3 If there is a violation of the ethical guidelines, the board or superiors shall make the necessary disciplinary or preventive actions; usually oral/written warning, revocation of powers of attorney or dismissal.