



CODE OF CONDUCT

VERSION 002

Date: 07-06-2022

1. INTRODUCTION

Our Code of Conduct (“Code”) describes, in practical and clear terms, the required behavior standards for all employees of the Almar Group (“Almar”) and facilitates the implementation of Almar's values - Integrity, Excellence, and Innovation. The spirit of the Code is that everything we do, we do with the highest possible standards of integrity. We chose the word integrity because we believe it encompasses ethics, morality, and honesty.

Our commitment to our values allows us to hire the best talent, produce the highest quality shrimp, build relationships with committed customers and suppliers, and ensure respect for our employees.

Any organization that conducts business with Almar must respect our Code of Conduct; if at any time these standards are not evident, it should be reported by contacting info@grupoalmar.com.ec

It is our responsibility to motivate others to incorporate the behavior of Almar.

2. SCOPE

This Code applies to all employees of Almar (Produmar, Limbomar, Biogemar, Limbopack, Produpesada, and Socalmar). Additionally, while the Code is specifically written for employees, we expect our extended stakeholders - suppliers, contractors, customers, shareholders, and others - to respect the Code in connection with their business with us.

3. ALMAR VALUES

At Almar, we live our corporate values:

INTEGRITY.- We are consistent with our principles; we do not believe in shortcuts; cheating is unacceptable; we value transparency; our principles are non-negotiable.

EXCELLENCE.- We strive for excellence in our processes and practices; we learn from our mistakes. We do not accept mediocrity; we believe that good enough is not enough; we pay attention to details; we believe in discipline; we believe in the habit of excellence.

INNOVATION.- We are creative; we do new and different things; we foster an environment where our employees think differently.

4. GUIDELINES OF ALMAR’S CONDUCT

4.1 COMPLIANCE

- Comply with current legal and safety standards and regulations, as well as with all ALMAR’s regulations and policies.

4.2 MUTUAL RESPECT

- Ensure a respectful, cordial, safe, and inclusive working environment.
- Offer assistance and empathy to all employees.
- In case of receiving complains related to harassment, discrimination and/or abusive behavior, act promptly and decisively to take all necessary measures to prevent such conduct.

- Ensure that people are treated with respect in all aspects of Almar's interactions and apply policies and procedures consistently, regardless of who is involved.
- Respect and take care of colleagues' belongings, e.g., computer, radios, cell phones, and personal items.

4.3 EQUAL OPPORTUNITY EMPLOYMENT

We are committed to equal opportunities; we commit to hiring and retiring within the framework of the law and we commit to fair compensation.

No person working or aspiring to work at Almar, or in any way associated with it, shall be subject to discrimination based on illegitimate reasons such as ethnicity, place of birth, gender, cultural identity, marital status, religion, socioeconomic status, sexual orientation, disability, physical differences, or any other personal distinction. All forms of harassment are prohibited.

We also make all reasonable adjustments to fulfill our obligations to protect the rights of disabled individuals.

4.4 CONFIDENTIALITY

- Ensure the proper disposal of confidential materials of Almar.
- Safeguard the confidential information received by Almar from others under confidentiality agreements.
- Exercise caution in disclosing information, ensuring that your external communications (including online posts and social media) do not disclose confidential information or represent Almar unless authorized to do so.

Uphold the principle of confidentiality, which means respecting the privacy of information acquired as a result of professional and business relationships.

4.5 INTELLECTUAL PROPERTY

Almar's intellectual property rights, including our trademarks, logos, copyrights, trade secrets, technical knowledge, and patents, are among our most valuable assets. Unauthorized use can lead to a loss of value.

Respect copyright and other intellectual property laws. Never use protected logos, trademarks, or other information or property without prior authorization from the Commercial Department.

Respect the intellectual property rights of third parties. Improper use of others' intellectual property may expose Almar and yourself to fines and penalties.

4.6 ENSURING FINANCIAL INTEGRITY AND ACCOUNTABILITY

All employees of Almar, not just those in the Finance Department, have a responsibility to ensure that money is spent appropriately, our financial records are complete and accurate, and internal controls are respected.

To ensure we do this correctly, Almar maintains an internal control system to strengthen our compliance with legal, accounting, and tax requirements in all companies and farms we operate.

A core value of Almar has been to spend wisely. When submitting an expense report for reimbursement or when spending money on behalf of the Almar's companies, ensure that the expenditure is reasonable, directly related to the company's business, and supported by appropriate documentation. Always record

the purpose of the expense and comply with submission requirements. For more information, you can review our internal policy or consult the Admin Department.

4.7 ACCEPTANCE OF GIFTS AND CONFLICT OF INTEREST

Accepting gifts, entertainment, or other courtesies from a competitor, supplier, contractor, and/or client of Almar may create the appearance of a conflict of interest. Therefore, in line with our corporate principles and values, Almar employees will not receive any type of gift or present, regardless of cost or value.

Reject all forms of money laundering, preventing any involvement in illicit activities, fraudulent transactions, and/or overpricing.

We commit to fair hiring of suppliers and contractors.

We consider these decisions to protect the interests of all and provide a framework of transparency when conducting business.

4.8 INTERPERSONAL RELATIONS

Romantic or familial relationships between employees where one person is in a position of authority or supervision over the other are not allowed. Therefore, consider how your relationships within Almar might impact or be perceived by others.

4.9 USE OF ALMAR RESOURCES

We care about the well-being of our employees. Our ability to continue these practices depends on how well we conserve company resources. The responsible use of assets such as vehicles, radios, cell phones, office materials, infrastructure, dorms, auditoriums, dining areas, sports facilities, bathrooms, and cafeterias is the responsibility of each employee.

Equipment should not be requested for purely personal use and should comply with the internal usage policies of each item.

Order and cleanliness are essential to create a safe and pleasant work environment. Maintaining a clean, organized, and well-presented workspace is the commitment of all employees.

4.10 PROTECTION OF THE ENVIRONMENT, HEALTH, AND OCCUPATIONAL SAFETY

We are committed to a safe, healthy, and violence-free work environment. Any behavior that poses a risk to the safety and health of Almar employees or visitors is prohibited. In the event of a safety and health risk in our workplace, report it to the Industrial Safety and Occupational Health Department at sima.almar@grupoalmar.com.ec so that preventive and corrective measures can be taken as applicable.

Every worker has the responsibility to work safely and to comply with all relevant environmental, occupational, health, and safety laws and regulations that help us maintain and comply with the parameters of our certifications.

The waste generated by productive activities must be disposed of in accordance with the legal and internal regulations of the company.

5. COMPLIANCE WITH THE CODE OF CONDUCT

5.1 HOW COMPLIANCE IS CONTROLLED

Compliance with the Code of Conduct is the responsibility of everyone. Individuals or organizations that become aware that a person from Almar, regardless of his or her position, or any related person or organization, has violated this Code must report it to info@grupoalmar.com.ec. The identity of the informant will be treated with absolute confidentiality to prevent any form of retaliation.

Individuals or organizations that violate this code will be subject to the measures outlined in our Internal Work Regulations, labor and/or legal norms, as applicable.

Remember to act with discretion and if you see something you believe is not right, report it!

Sincerely:



José Antonio Lince Rendón
Executive President