

Code of Conduct





Greenland Seafood

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I. Scope

The following principles and other provisions apply to the companies AliSa International GmbH, Greenland Seafood Wilhelmshaven GmbH, Greenland Seafood Europe GmbH, Greenland Seafood Europe SAS and Gelmer SAS (hereinafter "Greenland Seafood").

This Code of Conduct describes the rules that are binding for everyone in the company: in dealing with each other within the Greenland Seafood Group and with all our partners outside. It draws clear boundaries, which everyone must fully accept.

The Greenland Seafood Group as a company is committed to this Code of Conduct and every individual is responsible for ensuring that everyone can be measured against this code of conduct.

II. Company Principles

As one of the leading companies in the European frozen fish industry, we have been an important partner and supplier in the retail grocery business and wholesale fish business for years. The continuous improvement of our processes and product quality as well as the development of innovative products promote customer satisfaction and customer loyalty.

We build on our experienced employees in the various departments who, through their successful cooperation, dedication, highly developed professional skills, and love of their work, produce and market more than 2 million fish-based meals every day.

We respect the diversity of cultures and recognize the variety of their values and traditions.

Our work is characterized by our company's principles and principles of conduct:

- Customer satisfaction shapes our action.
- Our competitiveness determines our market position.
- Short decision-making pathways and well-thought-out work procedures secure success.
- We follow applicable law and internal guidelines.
- We accept economic, social, and ecological responsibility in our daily actions.
- Fairness is a duty we owe everyone in the company.
- We show respect to each other and provide mutual support.
- Agreements are honoured in an environment of trust.
- Praise, recognition, and the ability to accept criticism should shape our operational climate in our daily work.









III. Ethical Principles

1. No Forced Labour or Child Labour

 We accept no forced labour, human trafficking, involuntary labour and child labour of any kind.

2. No Discrimination aganist Employees

In hiring, compensation, admission to training programes, promotions, dismissals, or retirement there will be no discrimination based on race, caste, national origin, ethnic origin, religion, age, handicapped status, sex, marital status, sexual orientation, membership in a union, membership in a political organization or any other personal traits.

3. Human Working Conditions

Greenland Seafood

- hires employees based on documented contracts in accordance with the law.
- provides for a safe and clean working environment as well as for working conditions that preserve health.
- accepts no forms of psychological, mental, sexual, or other harassment.
- provides for a safe and hygienic working environment considering the required skills of the industry and specific hazards.
- provides for appropriate measures to avoid accidents and harm to human health.
- assures, to the extent practically possible, that the hazards present in the working environment are kept to a minimum.
- takes care of any employees who have suffered from a workplace accident and takes measures to prevent them in the future.
- makes sure that the employees regularly receive documented training in health and safety. This training will be repeated for new hires or newly assigned employees.
- guarantees access to clean toilets and drinking water.

4. Environmental and Safety Aspects

Greenland Seafood



- has procedures and concepts for waste management, handling chemicals and other hazardous materials as well as their disposal.
- makes sure that the employees learn to handle hazardous materials.
- meets or exceeds compliance with the minimal legal requirements for emissions and wastewater, treatment.
- makes sure that employees are protected from passive smoking.

5. No Unusually Long Working Hours

Greenland Seafood

- complies with the provisions of law applicable to working hours, breaks and holidays.
- does not demand regular overtime.
- carries out overtime on a voluntary basis; this should not exceed 8 hours per week and will be compensated for at an increased rate.

6. Payment of Suitable Wages

Greenland Seafood

- pays suitably high wages and salaries compared to the work completed.
- pays at least the legally required wages and salaries and those typical of the industry.
- pays wages and salaries to the employees punctually.
- provides information in an easily understood written form about the amounts of the salaries and the details of the salary payments per each payment period to its employees before they arrive at the workplace.
- will adhere without restriction all agreements from the master agreement and the wage rate and salary agreement.
- makes sure that employees are informed in an easily understood written form
 concerning their terms of employment with respect to compensation before they
 accept employment and that they receive, on every disbursement of
 pay, a wage and salary statement for the corresponding payment period.

7. Freedom to Form Unions and the Right to Collective Bargaining

Greenland Seafood expressly recognizes the right of all employees to form unions and join them as well as to undertake collective bargaining.

Representatives of the employees will not be discriminated against and can carry out their functions as representatives at the workplace without hindrance.

To exercise their representative function employee representatives, have access to all necessary workplaces.

The employer is open to union activities and views them positively.



IV. Leadership Principles

1. Leadership Culture

Our leadership values are:

- Inspiring people
- Driving results
- Leading the way
- We create a climate in which we facilitate initiative and performance, pleasure and satisfaction in the work.
- We enable our employees to work responsibly and successfully in our company and promote their development.
- We are aware that every one of us is a model to others, contributing to living out our guiding principles for leadership.

2. Leadership Objectives

- We discuss objectives jointly with our employees, clearly define tasks and create areas of responsibility with some freedom.
- We trust our employees to carry out the tasks assigned to them to the best of their ability and to develop suggestions and ideas that advance our company.
- We talk to each other and promote direct, honest, timely communication.
- We treat each other fairly and respectfully.
- We keep our promises and agreements and are reliable partners for our employees.
- We give every employee regular feedback on his/her performance and conduct. We provide support and motivation through constructive criticism and positive recognition of work done.
- We check and monitor professionally and appropriately. Together with our employees we create recognized potentials for improvement.
- We are especially during crises and conflict situations- reliable, honest, credible, and loyal.
- We are open to changing requirements and limiting conditions with the object of continuing to develop and improve the company.

V. Principles of Conduct in Dealing with Employees

- We act in such a way that we are recognized and esteemed as an attractive employer.
- We fill open positions preferably from our own ranks and prefer specifically transfers across divisions and companies.
- We make hiring decisions with the participation of the immediate superior.
- We welcome new employees on their first day with attention and are well prepared.
- We train every employee to his/her new tasks and functions to the point of qualification.



- We determine the success of initial training with regular feedback discussions.
- We create the conditions in terms of working hours and framing conditions, which enable our employees to balance their work, family, and leisure time as much as possible.
- We reward the performance and dedication of our employees in ways appropriate to the position and the situation on the labour market.
- We support and promote our employees in their professional and personal development.
- When employees leave, we make sure their departure is amicable, fair, and respectful.

VI. Principles of Conduct in Dealing with the Business Partners

- We prove ourselves to be competition-oriented and fair to our business partners.
- With our business partners we define a clear scope of services and thereby avoid misunderstandings and lack of clarity.
- We honour our promises and agreements and are a credible partner. At the same time, we expect that our business partners honour their promises and agreements.
- We monitor the compliance with the agreed-upon scope of services.
- We negotiate agreements with a focus on price and competitiveness and are basically open to new business partners.
- We deal with our business partners in a fair manner that fosters partnership and do not adopt a superior and arrogant manner.
- We communicate constructively, professionally and in an appropriate framework.
- We are open to constructive ideas and objectively test our company's potential for further development and improvement.
- We neither accept nor offer any gifts or invitations intended to influence the decisions or actions of others.

VII. Fighting Corruption

1. Greenland Seafood does not accept corruption, bribery, blackmail, and embezzlement.

Greenland Seafood works for ethical business practices and rejects every form of bribery and corruption.

Greenland Seafood's ethics and principles of conduct obligate all employees to observe the applicable laws, norms, and regulations as well as internal directives and guidelines.

The principles of conduct prohibit the acceptance or offering of gifts or invitations intended to influence decisions or other actions.



Our suppliers, and employees, are explicitly required to report any attempts at corruption or bribery or other "dirty" business practices on the part of Greenland Seafood.

Additionally, the corruption risks within the Greenland Seafood corporate group will be evaluated and measures to reduce these risks will be initiated.

2. Monitoring and Controlling

All business divisions must monitor compliance with internal directives in a suitable manner and degree and their effectiveness and compliance will be reviewed with an internal audit. Any findings will be reported to the audit committee and the compliance officer for the Greenland Seafood Group (Group Compliance Officer). This person is appointed internally.

Our employees in high-risk business areas receive regular training on how to prevent and combat corruption.

3. Whistleblowing

Greenland Seafood requires all employees to report any violations of internal directives. Reports to the Group Compliance Officer will be handled confidentially or anonymously. Greenland Seafood will make sure that the reporting persons are safe from reprisals. Greenland Seafood will always strive to comply with the law, and continuously make sure to adapt the whistleblower wording according to changes in the legislation.

VIII. Ethical and Social Principles for Suppliers

No Forced Labour

No forced labour, human trafficking and involuntary labour will be tolerated. This excludes also work done to pay off debts and the work of imprisoned criminals. The workers may not be forced to pay deposits and leave their personal identification documents with the employer. A job must be taken voluntarily.

No Discrimination

Employees of Greenland Seafood suppliers may not be subjected to any discrimination based on their sex, race, ethnic origin, religious or political convictions or any other personal traits.

Greenland Seafood accepts no corruption, blackmail, embezzlement, and bribery.



• No Child Labour

Greenland Seafood does not accept child labour. The minimum age for employees must comply with the local laws but may not under any circumstances be under the age of 15. If a child in this sense needs to leave its job, it will be provided with financial assistance and support in education. Employees, who are no adults yet (under 18 years) are subject to special protection.

Freedom to Form Unions and the Right to Collective Bargaining

The right of all employees to form unions and join them as well as to undertake collective bargaining is expressly recognized. Employee representatives may not be subjected to any discrimination and should receive access to all workplaces necessary for the exercise of their function as representatives. The employers must be open and positive with respect to the activities of the unions.

• Payment of Suitable Wages

Wages must be paid out regularly and punctually and must be appropriate to the work done in terms of their amount. The wages and additional benefits for a normal work week must at least conform to the legally required and industry standard minimums and not only cover the basic needs of the employees and their families, but also grant something of disposable income. Prior to the start of employment, the employee must be informed in writing in an easily understandable form concerning the level of compensation and the details of the payments of compensation for each payment period. Deductions from compensation as a disciplinary measure are not permitted. Neither may any deductions be taken from wages or salaries that are not provided for by law without the expressed consent of the employee.

No Unusually Long Working Hours

The working hours must comply with the legal norms and industry standards. In no case may workers be required to regularly work more than 48 hours per week. At least one free day must be granted per week (7 days). Overtime shall be offered on a voluntary basis, not exceed 12 hours per week, not be demanded regularly and be compensated at an increased rate.

Humane Working Conditions

At the workplace there should be safe and healthy working conditions. The risk must be assessed and all necessary measures for elimination or reduction must be taken. "Best practices" should be promoted with respect to carrying out the work, and to workplace health and safety. Greenland Seafood does not tolerate any forms of psychological, mental, sexual, or other harassment. Greenland Seafood suppliers hire employees based on documented contracts in accordance with the law.



This code of conduct only sets down the minimum requirements. For that reason, Greenland Seafood does not accept that the requirements and conditions of this codex be understood as maximum requirements or conditions. Greenland Seafood suppliers and their sub-suppliers must comply with the provisions of law of the country in which they work. If there is a discrepancy between the local law and this code of conduct, those regulations will apply which grant the workers the highest degree of protection and safety.

Regular employment relationships must be established. No specific work contracts may be issued with the intent of avoiding obligations to the workers in terms of labour or social insurance benefits laws nor avoiding or circumventing any provisions of regular employment relationships. Nor may any apprentices be engaged, if the employer does not actually have the intent of teaching specific skills or granting regular employment. Young workers must be offered the opportunity to receive training.

Greenland Seafood suppliers communicate their management principles to their employees in their native language.

Environmental and Safety Questions

Procedures and standards for waste management, handling chemicals and other hazardous materials as well as their disposal along with those for emissions and wastewater treatment must conform to or exceed the legally mandated minimum requirements.

Energy Management

In a certification audit the company Greenland Seafood has demonstrated that an energy management system was introduced and successfully applied. We are therefore committed to work in a resource-friendly production facility and administration and continuously improve our energy efficiency to achieve savings.

We expect the same from our suppliers. Offered equipment, machinery and other goods and services are evaluated for their energy efficiency.

Greenland Seafood reserves the right to carry out unannounced inspections at any time. Such inspections can also be carried out by independent third parties.



If the code of conduct is violated, this can lead to a termination of business relations

IX. Responsibility

We are conscious of our responsibility for people and nature and continuously work, within the framework of possibilities open to us, to make improvements in the areas of society, the conditions for our employees as well as to protect the environment and climate.

We are aware that we can only meet this responsibility together with our motivated and dedicated employees. For this reason, we strive to remain a responsible and attractive employer in the future.

X. Society

Greenland Seafood and its employees are a part of society and we work purposefully with recognized partners within the framework of the options available to us.

1. Employees

We support the personal and professional development of each individual employee as best we can and fill, whenever possible, any new positions in the company with employees from our existing staff.

- We always make the effort to recruit competent and motivated employees as well as to provide safe, healthy working conditions and such a working environment.
- We include the employees in the daily dialogue through the safety organization and integrate them in the development of a preventative work environment.
- In cooperation with our employees, we draft a workplace evaluation to reduce the risk of harm or losses.
- We make the work environment a component of the overall evaluation in the purchase of new production equipment.
- We generate work instructions that contain safety rules.
- We collaborate actively with the leadership of the professional society and other represented interests.
- The employees also have the opportunity to visit the company doctor.



2. Employee Loyalty

Our company is shaped by motivated and dedicated employees. Our company is shaped by motivated and dedicated employees. More than half of all our employees have been employed for more than 10 years and more than 25% of all employees have been employed for more over 20 years.

3. Professional Training

In its business activities Greenland Seafood combines different branches of the industry and for this reason, it trains employees in the professions:

- Clerk in wholesale and foreign trade (education only in Bremen possible)
- Machine and plant operator
- Food technologies specialist
- Warehouse logistics specialist
- Industrial mechanic
- Electronics technician for industrial engineering
- Industrial clerk
- IT specialist system integration
- · Office communications clerk

Training at Greenland Seafood means working in a field with a lot of variety where the payment, opportunities for development and future changes are all suitable.

To prepare our apprentices for their future professional tasks optimally, they are placed into real practice right on their first day at Greenland Seafood. Supported by experienced colleagues, on-site trainers as well as training supervisors they receive a thorough overview of the daily business.

They also participate in advanced internal and external training, seminars, and projects. Greenland Seafood apprentices are often numbered among the best in their year cohort.

4. Protecting the Environment and Climate

The effects of climate change are to be observed world-wide on both people and the environment because global warming changes weather conditions and thus habitats in an increasing measure. Protecting the climate is therefore one of the greatest challenges of our time. With this in mind, we produce our products under the most environmentally sound conditions possible, with a focus on optimal energy efficiency and efficient internal processes.



In a certification audit the company Greenland Seafood has demonstrated that an energy management system was introduced and successfully applied.

With different measures in these areas, we make a positive contribution to the protection of our environment and climate and conservation of natural resources.

- We include our employees in actions intended to reduce pollution of the environment.
- For us, the environment is part of our daily agenda when we face decisions about new processes and forms of transportation.
- We work with the authorities and representatives of other interests to assure compliance with the established rules.
- We demand that our suppliers evince a pronounced environmental consciousness.
- We make every effort to optimize use of water resources.
- We will minimize the quantities of waste through best possible use of our resources.
- Recycling is part of our waste disposal procedure.
- We document environmental pollution that we cause and are anxious for reducing it permanently.
- We communicate our goals openly and report intermediate results, deviations and corrective measures regularly.

XI. Responsibly Handling Ocean Resources

As a company of the fish industry Greenland Seafood with its high annual use of fish raw materials is dependent on the conservation of marine resources and has a very own interest in ensuring that they are not exploited ruthlessly but managed sustainably.



With our sustainable management and purchase strategy, we support the responsible handling of fish resources.

The "Marine Stewardship Council"

The Marine Stewardship Council (MSC) is an independent, global non-profit organization that was founded in 1997 to find a solution for the problem of overfishing. Fisheries which can demonstrate that they catch fish and seafood sustainably according to the MSC standard may label

their catch with the MSC seal.



Greenland Seafood produces many products from MSC-certified raw goods in its factories, which is likewise certified according to the MSC-traceability standard.

We contribute to the conservation of biodiversity and protecting marine resources in the following ways:

- We are convinced that responsible fishing means that requirements and restrictions deriving from national and international laws must be observed.
- We recommend that the TAC (Total Allowable Catches) be established in close coordination with the recommendations of recognized ocean biologists or research institutes
- We do not purchase any fish from illegal fishing and make sure of this by obtaining IUU-certificates.
- We support rules for controlling fishing, by-catches and catch volumes as means of fighting illegal fishing.
- We control the documentation of products from MSC fisheries from the catch to the processing of the raw goods and adding value in our own factories through to shipping to our customers.
- We purchase products from companies from countries in which the authorities can guarantee secure controlling and correct reporting.
- Furthermore, we apply additional safety requirements and check compliance them through our own or independent audits.
- We work with the authorities, organizations, suppliers, and customers in order to meet the increasing demands with respect to consistent traceability and transparent labelling in products from fisheries.

We can trace the fish raw materials back to the main catching areas and the sub catching areas and therefore identify the catch period as well as the ship's name or name of the fishing fleet.

We are working on labelling our products with additional useful consumer information going beyond the legally required information to further increase transparency with respect to the fish raw materials used.

Requirements for Greenland Seafood suppliers to conserve biodiversity and to protect the marine resources:

- Greenland Seafood suppliers use only those catching methods, which are considered to be environmentally friendly and they are encouraged to reduce the extent of juvenile fishing.
- Our suppliers do not fish in sensitive habitats of FAO 61 and FAO 67.
- Wherever possible, Greenland seafood suppliers preferably do not fish during the spawning season.
- Our suppliers have implemented a management system to minimize bycatch, to exclude a discard and catching of young fish.





The Forest Stewardship Council (FSC)

Forests are life: They provide fresh air, clear water, and make an important contribution to global climate protection. Many different species of animals and plants find their natural habitats in forests.

Trees are valuable renewable raw materials with correspondingly high commercial value. To maintain the ecological, social, and commercial value of forests for the long term and steward the forests responsibly, is an international challenge that demands and presumes joint action.

The FSC has set itself the goal of establishing internationally valid standards for ecologically, economically, and socially sustainable forest management. To this end principles were drafted as a standard for forest management; by recognizing them, forestry businesses and downstream companies in lumber processing (among others, paper manufacturers and printers) can participate in a certification system. The FSC seal of approval is granted to businesses that are regularly tested and certified according to the rules of the FSC. The awarding of the FSC certificate guarantees that all steps in the work – from silviculture and logging through processing and transport to sales – are controlled according to the requirements of the FSC.

The FSC logo signals to the consumer that these are wood products that come from sustainable and environmentally sound use of forests.

• Greenland Seafood has set itself the goal of purchasing all folding packaging it uses from FSC-certified production over the medium term.

XII. Food Safety and Quality

For us, the strictest standards of quality and hygiene are assumed. Regular, independent controls and quality certifications by independent institutions confirm that the fish products that are manufactured and marketed by Greenland Seafood are safe and meet the high-quality requirements of our customers and the consumers.



I. Food Safety Culture

It is a matter of principle that all legal requirements regarding food safety are exceeding its food safety commitments. The quality system of Greenland Seafood focuses on the delivery of safe products to our customers.

We have long-standing commitments to improve company Food Safety Fundamentals and produce safe and quality products. We achieve this by maintaining a HACCP based Food Safety system (SQF Code), which is independently and regularly audited by a recognized auditing agency. Our management and all plant personnel are involved in all aspects of operations. They understand our policy, our commitment and our customer's requirements.



Greenland Seafood

They are part of our continuous improvement team, which feeds off our system reviews. Our personnel is our most valuable asset.

We believe that our success will be achieved by:

- Regularly maintaining and improving SQF Code in the facility
- · Leading by example
- All employees playing their part in achieving high standards of product/food safety and quality
- Providing continuous training and education of all employees
- Adherence to documentation SQF, HACCP, SSOP, GMP, Pre-requisite, SOP manuals and procedures
- Constantly reviewing and improving our food safety plan

The management of Greenland Seafood has provided, and will continue to provide, food safety and a safe environment suitable for employees to achieve these objectives. The continued involvement of our employees and development of our management is a main contributor to our success.

2. Food Quality



The "International Featured Standard" (IFS)

To guarantee optimal food safety and maximum confidence in the manufacturer, the main professional association of the German Retail Trade (the HDE) together

with the representatives of the retail foods trade have developed the International Featured Standard Food (IFS Food). It is a standard recognized by the GFSI (Global Food Safety Initiative) for auditing food manufacturers. The focus of IFS Food lies on food safety and the quality of the processes and products. In the production this assures continuous monitoring and compliance with food safety laws. The Greenland Seafood factories in Wilhelmshaven and Gelmer SAS have already been evaluated and certified with the IFS Food Grade "High Level" for several years. Both production locations are registered for the unannounced audit option.

The IFS Broker is a standard for auditing the quality management of trading companies. This standard was developed based on IFS Food and aims to improve the involvement of brokers to ensure the quality and safety of food along the entire supply chain. Greenland Seafood Europe GmbH and Greenland Seafood Europe SAS as the sales office in Bremen and Paris are successfully certified according to the IFS Broker.





The "BRC Standard"

The British Retail Consortium (BRC) has issued this technical standard for suppliers in the food sector. BRC is, like the IFS, recognized by the GFSI (Global Food Safety Initiative). It has however gained more acceptance in English-speaking Europe

and the USA and parts of Asia compared to the IFS. It is a precondition for the entry of products into British retail trade. This standard requires the implementation of the HACCP-systems, a documented QM system and control of the hygienic conditions with respect to products, processes, and employees.

For years, the Greenland Seafood Factory in Wilhelmshaven and the factory in Gelmer SAS have already been repeatedly evaluated and certified with the BRC grade "A-Grade".

The BRC audit takes place at both locations as an unannounced audit option.

In connection with the before mentioned standards and beyond, we have defined further principles and objectives:

- We will work openly with the authorities in a relationship of mutual trust.
- We keep ourselves up to date with respect to the legal requirements.
- We comply with the provisions of law.
- Our quality management system is based on risk assessments.
- The risk assessments will be updated, if there are changes in the raw materials or consumable materials, process steps, or parameters or other changes to the product, the manufacturing process, or the environment.
- Our factories and plants are maintained and repaired according to the principle of minimizing risks.
- Along with controlling and documenting the quality of the raw and finished goods, we carry out controls in the ongoing production process to be able to react to any deviations pro-actively.
- We work with our customers in a trusting, professional relationship and react immediately to any feedback with respect to food safety and the quality of our products.
- We can trace raw goods, packaging, and ingredients back to suppliers and if necessary, even further.
- We can initiate a re-call of a product on the market in fewer than 4 hours.
- In the interest of providing accurate and comprehensive information to consumers, we assure that the labelling on our product packages is factually accurate and as transparent as possible.



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- We inform consumers of the nutritional values and calorie counts for the products on the product packaging in a way that exceeds the legal obligations to the extent that this is desired.
- We use the GDA (Guideline Daily Amounts) labelling to the extent that this is relevant for the individual markets.

XIII. How we live our Code of Conduct

All employees are informed about the Code of Conduct after joining the Greenland Seafood Group. Executives are required to regularly address issues of importance to their area and to promote understanding of its application.

If employees are unsure about the provisions of the Code of Conduct or the correct behaviour in certain situations, all executives and the Compliance Office Manager are always available.

The contact details of the Compliance Office Manager can be found at our webside.

Greenland Seafood and its employees are committed to reviewing all violations, clarifying them with those concerned and determining disciplinary measures if necessary. If requested, the Compliance Office Manager will maintain the whistleblower's anonymity and protect him from possible pressure from other parties involved.

Violation of the Code of Conduct may harm the integrity of the Greenland Seafood Group. For this reason, all violations are taken seriously, and Audits will check at regular intervals whether there are any indications of misconduct.



Thank you for being interested in our company. Please do not hesitate to contact us in case of any questions.

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Created: 01.06.2017

Updated: 26.02.2021

Approved: 22.03.2021