

Code of Conduct

This document sets the conditions for how we relate to each other and to our surroundings. All other policies and procedures in Seaborn should be based on these principles. This document describes what is expected of directors, officers and employees of Seaborn and hired consultants acting on behalf of Seaborn. Seaborn also includes all subsidiaries.

Our relationship with the outside world

1. We act in a way that ensures Seaborn's neutrality, credibility and integrity

It is important for Seaborn that the general public have confidence in us and that our reputation is outstanding. All of our board members, directors, employees and contractors are responsible for contributing to this.

2. We comply with laws and regulations

We comply with prevailing laws, rules and standards, although it can entail additional costs or delays. It is a personal responsibility to ensure compliance with standards and restrictions set out in legislation.

3. We respect and care for environmental and climate considerations

Seaborn is an environmentally responsible company. We protect the climate and environment in all our decisions and strive to minimize our own environmental emissions.

4. We show deep respect for the UN's human rights and labor rights

Seaborn respect the UN Declaration of Human Rights and avoids involvement in violations of these. Seaborn ensure workers' rights, including employees' freedom of association and right to collective bargaining, the removal of child labor and the prohibition of discrimination in employment and occupation appointments. Seaborn base their activities on the International Labour Organization's core conventions and recommendations. We share a responsibility for Seaborn's compliance with these requirements.

5. We provide accurate information to our customers, suppliers and partners

Information that is sensitive to competition is confidential and shall be handled in accordance with our rules for dealing with such information. We all have a personal responsibility to follow Seaborn's provisions related thereto.

6. We communicate clearly and correctly

Seaborn communicate openly and precise with all stakeholders and ensure that important information is given at the right time. Communication with the media and the public is in accordance with Seaborn's guidelines and in accordance with applicable authorizations.

Our approach

7. We make our decisions based on professional insight at the right organizational level

We make decisions based on professional assessments and thorough analyzes of facts. Any decision is made at the appropriate level of the organization and in accordance with the authority structure in Seaborn.

8. We put Seaborn's interests first

Seaborn respects the individual employee's right to privacy and private interests, and demands openness and loyalty in relation to Seaborn's interests. We do not put ourselves in a position where we can get in a conflict of interest with Seaborn. We do not use confidential information for personal gain. We clarify directorships and ownership interests in customers, suppliers, stakeholders in the seafood industry and partners with our superiors. We shall not hold positions or holdings where the loyalty of Seaborn might be doubted, or which may put Seaborn's reputation or credibility into question. If partiality occurs, it is our duty to warn the involved parties about the condition.

9. We respect that information is confidential

Knowledge you have received while you have been working for Seaborn about customers, employees, suppliers or business partners are subject to confidentiality. This includes information about commercial operation, safety issues, personal information and matters of internal and / or confidential nature. The duty of confidentiality applies both internally and in relation to colleagues who do not need the information in their work. We do not provide confidential information to third parties without the written consent of the protected party, or where this is permitted by law or regulation. Professional secrecy is not an obstacle for notification of unacceptable conditions.

10. We manage information and IT systems in a responsible manner

Seaborn collects, processes and uses information, IT systems and internet services in a responsible and professional manner. Electronic data stored in Seaborn's IT systems is the Group's property, and we accept that Seaborn is entitled to read the electronic information stored on all Seaborn's IT systems.

11. We have good internal control of accounting information and quality processes

We ensure internal control in the processes we are involved in by implementing control measures according to documented policies.

12. We protect Seaborn's assets

Seaborn's assets are safeguarded and protected in an appropriate manner. We do not use Seaborn's assets for personal purposes unless this is clarified in the employment relationship or is a result of Seaborn's rules and guidelines.

13. We have zero tolerance for corruption, bribery and money laundering

Seaborn is actively working to combat corruption. This means that we do not offer or receive monetary or other economic benefits for the purpose of obtaining personal or business advantages for ourselves or others. In Seaborn we are cautious about the use of agents and brokers. In Seaborn

we reject all forms of money laundering. We ensure that Seaborn's financial transactions are not being used by others to launder money.

14. We are cautious with gifts and other benefits

We are conservative about receiving or giving gifts or courtesies. We do not accept gifts or other forms of remuneration if there is reason to believe that the purpose is to influence business decisions. Gifts or benefits with a value below the equivalent of NOK 1000 is normally acceptable. Gifts with a value of more than the equivalent of NOK 1000 shall nonetheless be reported and recorded, even though it is considered that it does not affect business decisions. Travel cost and accommodation shall always be paid by Seaborn, and we always confer with our immediate superiors when we are uncertain about gifts and benefits.

Our working environment

15. We take health, safety and environmental concerns seriously

Seaborn is a safe workplace. HSE is ensured through preventive measures and effective internal controls. Seaborn endeavors to meet national and international standards for health, safety and environment. We are all responsible for contributing to achieve these objectives.

16. We promote equality and diversity

Seaborn is a company that is characterized by respect and equal opportunities for all through a professional, positive and inclusive work environment. Seaborn stimulates all employees, regardless of gender, nationality, religion, disability, sexual orientation, age or political standpoint, to professional and personal growth, responsibility and utilization of their own resources. We are all responsible for contributing to the prevent discrimination or sexual harassment by colleagues to take place in Seaborn.

17. We have a drug-free work environment

We have a drug-free work environment. We do not tolerate that our colleagues are intoxicated at work.

18. We refrain from buying sexual services

We have zero tolerance for any kind of purchasing of sexual services on business travels or assignments, or when you are working for or representing Seaborn.

19. We have the right and duty to speak up about misconduct in Seaborn

Seaborn encourage everyone to report any activity or situation that are not in compliance with our Code of Conduct. Notification should be made to the immediate supervisor, alternatively to human resources manager. Management shall protect the person reporting misconduct, and take active initiative to sort out and stop any unacceptable behavior.