#### **Codes of Conduct of Brim and its Subsidiaries**

The role of Brim is to responsibly maximise the value and profitability of the company's catch quota.

Brim's policy is to be an integrated fisheries company involved in vessel operation, processing and sales operations that provide returns to owners and a desirable working environment for employees. The company operates in harmony with the environment and takes full responsibility, with the goal of ensuring secure employment and the viability of fishing villages outside Reykjavík.

The tasks of the management include making detailed examinations of the value chain of the company, fishing, processing, research, product development, marketing, distribution and sales – for the purpose of promoting the protection and economic utilisation of fish stocks to create as much value as possible to divide between employees, owners and Icelandic society at large.

## 1. Laws and respect

We focus on complying at all times with laws and general criteria for ethical business practices and follow the rules that the company establishes for itself. We respect human rights, particularly those that relate to freedom of association, forced labour and slavery and inequalities in workplaces.

We show respect for each other and do not tolerate injustice, such as victimisation, sexual harassment or discrimination on the basis of unjustified aspects such as gender, religion, race or sexual orientation. If we become aware of victimisation or injustice, we immediately inform our supervisor of such event. We notify our supervisor if we witness any incidents of theft, corruption or irregularities within the company.

We do not take advantage of our position in the company to the detriment of the company. We do not misuse e-mails, computers, letterheads or visiting cards, etc. with personal gain in mind.

### 2. We maintain confidentiality

We are bound by confidentiality as regards whatsoever we may become aware of in our work and relates to the customers of the company, as well as the operation of Brim. We know that the obligation of confidentiality remains in effect even when we leave the employ of the company. We do not use confidential information for financial gain, neither for ourselves nor others. We treat the confidential data of the company with care and ensure that such data is securely stored.

#### 3. Gifts and interests

We do not accept gifts or other forms of payment or services, such as paid trips, entertainment, benefits or favours except with the approval of a supervisor. This applies to gifts from suppliers, those that wish to enter into a business relationship with Brim or others who could profit from the decisions of an employee of the company.

We avoid making decisions that could cause a conflict of interest. In principle, our interests and those of Brim accord with each other. We must be alert and take an honest position if the situation arises that our decisions lead to our personal benefit and seek the advice of a supervisor in all matters of doubt.

# 4. The community and social affairs

We participate in all social activities and address social issues. We wish to benefit those around us. We take care, however, that our conduct outside working hours does not have an ill effect on our work or the reputation of Brim. The managers and supervisors of Brim need written authorisation to undertake paid work outside the company.

#### 5. Good communications

In order to improve our performance and job satisfaction, we comply with communication rules and treat each other as we ourselves would wish to be treated.