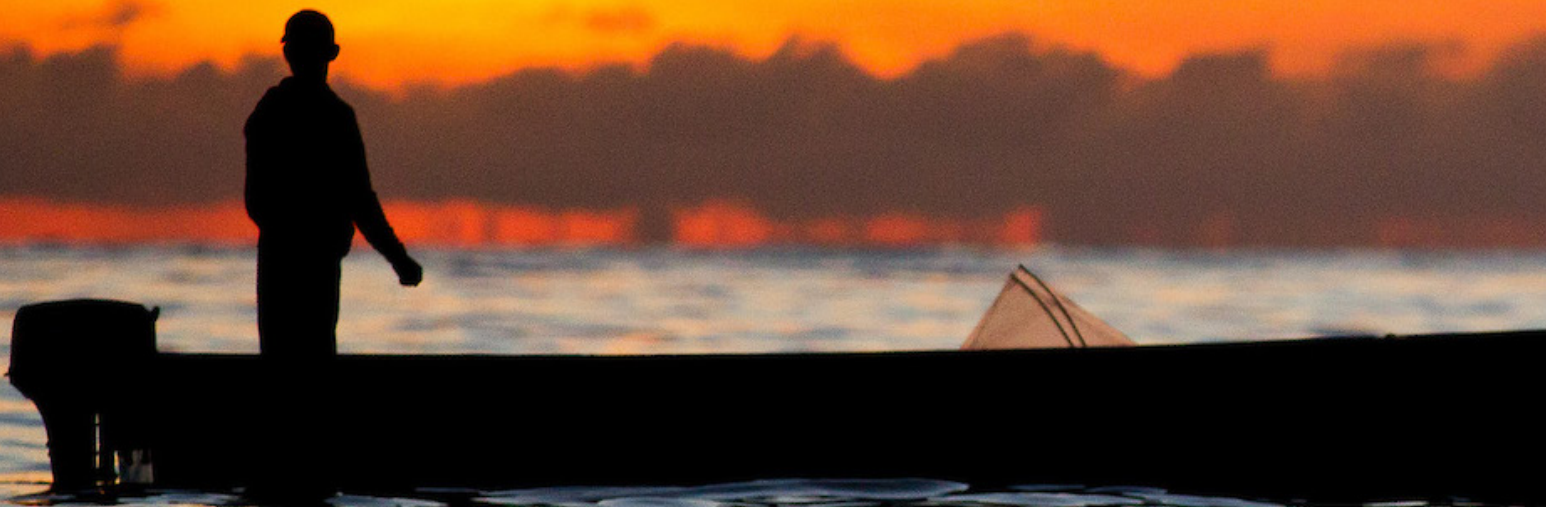


Ethics & Good Governance

COMPANY POLICY



Certified



Corporation

blueYou

Ethics & Good Governance

Scope of Policy	This policy refers to Blueyou's operations worldwide
Applicability	All employees, management staff, companies, projects and programs under direct contract agreements and management by Blueyou
Version	V 2.0 December 2024
Replaced Version	V 1.0 December 2023
Revision Frequency	Annually
Author	René Benguerel Head of Policies and Impact
Responsible Person	Livia Ramazzini Head of Quality Management & Compliance

1. Blueyou's Commitment and Policy Summary

Blueyou's global mission to serve the ocean requires employing and deploying a team of people from a wide range of cultural, social, and academic backgrounds. Such diversity is both a challenge and a strength. It requires an environment of mutual respect and understanding to allow team members - individually and collectively - to interact, work together and achieve exceptional results.

Blueyou values all employees and job candidates as unique individuals, and we welcome the variety of experiences they bring to our company. As such, we have a strict non-discrimination policy. Blueyou does not tolerate discrimination, bullying, violence, or harassment and pursues an active policy to promote equal opportunities and inclusiveness.

More specifically, Blueyou does not tolerate any discrimination towards other team members, suppliers, customers, and other stakeholders on grounds such as gender, sexual orientation, sexual identity, disability, color of skin, social origin, religious affiliation, and national origin.

Blueyou commits to its values of doing business in a fair, respectful and transparent mode and applies these principles in working with partners along seafood supply chains globally. Blueyou actively pursues a non-corruption and bribery policy and commits to responsible business practices and good governance at all steps of operations.

Blueyou's policy on ethics and good governance provides all employees and partners with guidelines and orientation for their daily actions - and offers guidance on how to address and manage conflicts of interest, harassment, and compliance. Our code of ethics shall promote an inclusive and fair workforce and actively encourage discussions about ethics and compliance - empowering all employees to handle ethical dilemmas in a way that aligns with Blueyou company's vision and values.

This policy applies to all employees, management, contractors, suppliers, and partners operating within Blueyou's direct business activities, projects, and programs worldwide. It serves as a guiding framework to ensure responsible business practices and ethical decision-making at all levels of the organization.

Blueyou is dedicated to ethical, transparent, and responsible business practices. By embedding these principles into our operations, we create a stronger, more inclusive organization that upholds the highest standards of good governance. This policy is a living document and will be reviewed and updated periodically to maintain its relevance and effectiveness.

2. Background and Rationale

As a mission-driven small and medium-sized enterprise, Blueyou relies on transparent, good, and trusting relationships with its employees, customers, suppliers, and the wider communities our businesses and impact projects are embedded. By explicitly formulating the values and principles that are part of Blueyou's culture of doing business, we can both reinforce and publicly communicate to stakeholders worldwide – and ensure more effective and efficient workflows and outcomes.

Working with partners along global seafood supply chains on improving governance, combating illegal practices, fostering better management, achieving legal compliance, creating transparency, and driving responsible business practices requires Blueyou to first walk the talk itself: Both as an organization as well as by every individual employee and partner.

On its mission to serve the ocean, Blueyou can only succeed as an agent of change if all its staff members and management themselves follow responsible, ethical, transparent, and fair practices in their daily routines.

3. Code of Conduct

Blueyou's Code of Conduct establishes the fundamental ethical principles and professional standards that all employees, contractors, and partners must adhere to in their work. This code ensures that all individuals within Blueyou act with integrity, fairness, and respect.

Blueyou employees are expected to uphold the highest standards of professionalism in all their interactions. They must conduct themselves with honesty, transparency, and accountability, ensuring that their actions align with the organization's ethical commitments. Discrimination, harassment, bullying, or any form of inappropriate behavior is strictly prohibited. Blueyou fosters an inclusive and diverse workplace where all individuals are treated with dignity and respect, regardless of gender, nationality, disability, or social background.

Employees must avoid conflicts of interest and disclose any situation where personal or financial interests may compromise their professional responsibilities. They are also required to safeguard confidential information and respect data privacy laws to protect the integrity of Blueyou's operations.

Corruption, fraud, and bribery in any form are not tolerated. All financial transactions must be conducted transparently and in compliance with anti-corruption laws and company policies.

Blueyou is committed to a safe and healthy work environment. Employees must follow all workplace safety regulations and report any hazards or risks that may affect themselves or others. Ethical dilemmas should be raised through the appropriate reporting channels, and all employees are encouraged to seek guidance whenever they encounter challenges in maintaining ethical conduct.

Blueyou is committed to a safe and healthy work environment. Employees must follow all workplace safety regulations and report any hazards or risks that may affect themselves or others. Ethical dilemmas should be raised through the appropriate reporting channels, and all employees are encouraged to seek guidance whenever they encounter challenges in maintaining ethical conduct.

Additionally, Blueyou adheres to key principles of good ethical practice, which include:

- Meeting all legal and ethical obligations of all countries and organizations involved in its projects, including securing necessary ethics approvals.
- Following best practices where legislation is incomplete or absent.
- Ensuring strong leadership and participation from contributing communities to incorporate diverse perspectives, knowledge, and interests.
- Recognizing the value and importance of traditional knowledge alongside international scientific approaches and methods.
- Respecting the rights, privacy, and safety of individuals impacted directly and indirectly by project activities.
- Using Prior Informed Consent (PIC) principles when engaging with communities.
- Upholding the credibility of evidence, research, and other findings in decision-making.
- Removing barriers to participation in research and ensuring inclusivity.
- Enhancing transparency through open communication and responsible sharing of research outcomes.
- Ensuring that all activities are of practical value and contribute positively to Blueyou's mission.

Any violation of this Code of Conduct will result in disciplinary action, which may include termination of employment or other contractual agreements. The Code of Conduct is a living document and will be reviewed regularly to align with best practices and evolving governance standards.

4. Safeguarding

Blueyou maintains a zero-tolerance approach to inaction regarding safeguarding violations. Safeguarding encompasses preventing and responding to all forms of sexual exploitation, abuse, and harassment (SEAH), as well as other types of harm that may arise within our operations. SEAH includes, but is not limited to:

- **Sexual Exploitation:** Any actual or attempted abuse of a position of vulnerability, differential power, or trust for sexual purposes, including but not limited to profiting monetarily, socially, or politically from the sexual exploitation of another.
- **Sexual Abuse:** Any actual or threatened physical intrusion of a sexual nature, whether by force or under unequal or coercive conditions.
- **Sexual Harassment:** Any unwelcome sexual advances, requests for sexual favors, or other verbal or physical conduct of a sexual nature that creates an intimidating, hostile, or offensive work environment.
- **Grooming and Coercion:** Any form of manipulation or coercion used to gain access to or control over a vulnerable individual for sexual exploitation.
- **Abuse of Power and Trust:** Engaging in relationships or behaviors that exploit power imbalances between staff members, beneficiaries, partners, or other stakeholders.

Blueyou is committed to protecting all individuals engaged with our work, ensuring a safe environment for employees, partners, and the communities we serve.

Key principles of Blueyou's safeguarding policy include proactive prevention of harm – these include, but are not limited to training of employees, clear code of conducts (Reference: Section 3 and 5 of this policy) and ensuring that safe reporting mechanisms are in place –, immediate response to allegations, and strict adherence to the Safeguarding Code of Conduct (Reference: Section 5 of this policy).

Any violation of this policy will result in disciplinary action, which may include termination of employment or contractual agreements. Reports of safeguarding concerns must be submitted through one of the following designated reporting channels: (1) direct supervisor, (2) general management, or (3) the Head of Quality Management, who also serves as the ombudsman for compliance. This policy aligns with the CAPSEAH (Core Principles on the Prevention of Sexual Exploitation, Abuse, and Harassment) Principles, which include accountability, prevention, survivor-centered responses, transparency, and continuous learning. Blueyou commits to regular reviews and updates to ensure its continued effectiveness.

5. Safeguarding Code of Conduct

Blueyou upholds a strict Safeguarding Code of Conduct that applies to all employees, contractors, suppliers, and stakeholders involved in our operations. This code ensures that all individuals are treated with dignity, respect, and protection from harm. The key principles of the Safeguarding Code of Conduct include:

- 1. Respect and Dignity:** Employees must treat all individuals with respect and must not engage in any form of exploitation, abuse, harassment, or discrimination.
- 2. Prevention of Sexual Exploitation, Abuse, and Harassment (SEAH):** Employees must not engage in any form of SEAH, including but not limited to unwanted sexual advances, coercion, or abuse of power.
- 3. Safe Work Environment:** Employees must create and maintain safe spaces, particularly for vulnerable individuals, and must not place themselves in situations that may pose a safeguarding risk.
- 4. No Tolerance for Child Exploitation:** Employees must not engage in or tolerate any form of child labor, child exploitation, or activities that could endanger children.
- 5. Professional Boundaries:** Employees must maintain professional and ethical boundaries when working with beneficiaries, partners, and other stakeholders.
- 6. Reporting Obligations:** Any safeguarding concerns, suspicions, or violations must be reported immediately through the appropriate channels (direct supervisor, general management, or the Head of Quality Management acting as the ombudsman).
- 7. Confidentiality and Protection:** Blueyou commits to protecting whistleblowers and individuals who report safeguarding concerns. Investigations will be conducted fairly and confidentially.
- 8. Accountability and Training:** All employees must undergo regular safeguarding training to stay informed of their responsibilities and best practices in safeguarding measures.

Violations of this Safeguarding Code of Conduct will result in disciplinary action, including termination of employment and potential legal consequences where applicable.

6. Whistleblowing

Employees and stakeholders are encouraged to report unethical behavior, including fraud, corruption, and misconduct, without fear of retaliation. Reports can be submitted internally through the Head of Quality Management, who serves as the designated ombudsman. External reporting channels will also be available for cases where internal mechanisms may not be appropriate (Note: Management is currently working on establishing this external position).

Confidentiality is a priority, and Blueyou guarantees protection for individuals who make reports in good faith. Investigations will be conducted impartially, with all concerns being documented, reviewed, and addressed in a timely manner. The outcome of any investigation will be communicated to the reporter in a manner that respects confidentiality while ensuring transparency and accountability.

7. Gender Equality, Disability and Social Inclusion (GEDSI)

Blueyou is committed to fostering a workplace and operational environment that actively promotes gender equality, disability inclusion, and social inclusivity. This commitment is embedded in all aspects of the organization's policies and practices, ensuring equal opportunities for all individuals regardless of background or ability.

Blueyou's approach to GEDSI is guided by key principles, including eliminating barriers to participation, addressing systemic inequalities, and fostering a culture of respect and empowerment. The company implements GEDSI through targeted training, inclusive recruitment practices, and workplace accommodations for employees with disabilities. Monitoring mechanisms include regular diversity and inclusion audits, employee feedback surveys, periodic reviews of hiring and promotion data, and assessments of workplace accessibility and inclusivity. Additionally, the HR manager will track progress, ensure accountability, and implement necessary adjustments to enhance equality and inclusion across all operations.

8. Equal Opportunities and Diversity

Blueyou is committed to fostering an inclusive work environment where all individuals have equal access to opportunities and resources, regardless of gender, age, disability, ethnicity, religion, sexual orientation, or socio-economic background. We recognize that diversity enriches our workplace, strengthens our impact, and enhances decision-making processes.

We ensure that recruitment, promotion, and professional development opportunities are based solely on merit, skills, and experience. Discrimination or bias in hiring, employment conditions, career progression, or any aspect of work is strictly prohibited. Blueyou actively promotes workplace policies that support diversity, including flexible working arrangements, accommodations for employees with disabilities, and initiatives that encourage representation from underrepresented groups.

To implement and monitor this policy effectively, we conduct regular employee feedback assessments, and training on unconscious bias and inclusive practices. Blueyou continuously refines its policies to create an equitable and supportive work culture, ensuring that all employees feel valued and empowered to contribute to our mission.

9. Counter Fraud, Bribery and Corruption

Blueyou enforces a strict zero-tolerance policy on fraud, bribery, and corruption. Employees and partners must adhere to anti-corruption laws and ethical business practices, ensuring compliance with international and national regulatory frameworks. Any suspected fraudulent activity must be reported through the designated reporting channels: (1) direct supervisor, (2) general management, or the (3) Head of Quality Management, who serves as the ombudsman for compliance.

To ensure transparency and prevent financial misconduct, Blueyou mandates comprehensive due diligence procedures for all financial transactions, supplier agreements, and procurement processes. Regular internal audits and external financial reviews are conducted to identify and mitigate any risks of fraud or corruption. Employees are required to disclose any potential conflicts of interest and must seek approval for any gifts, benefits, or hospitality that could influence decision-making.

Violations of this policy will result in disciplinary action, including possible termination of employment or legal prosecution where applicable. Blueyou is committed to upholding financial integrity through continuous training, risk assessments, and strict enforcement of anti-corruption policies.

10. Grievance Mechanism and Procedures

Blueyou promotes ethical behavior and provides multiple reporting channels for concerns. Employees can report grievances directly to their supervisor, escalate issues to general management, or reach out to the Head of Quality Management, who serves as the ombudsman for policy compliance. All reports will be handled confidentially, with protections in place for whistleblowers to prevent retaliation.

11. Implementation and Compliance

The overall responsibility for compliance with this policy is with the general management, including the founders and directors of Blueyou companies. Regular training and awareness building for this policy is key for staff members to integrate the principles into their daily lives and routines. This policy will be reviewed annually to align with evolving governance standards and industry best practices.