

CODE OF ETHICS		
Code: GERG-FOR-012	Date: 03/02/2017	Version: 002

CODE OF ETHICS – 7 SEAS ENERGY S.A.S.

At 7 SEAS ENERGY S.A.S., we regard Integrity as the highest value that distinguishes us. Accordingly, within the company's strategic framework, this Code of Ethics has been developed with input from area leaders and approved by the Board of Partners. It serves as a guiding reference regulating the conduct expected from our organization in its relationship with various stakeholders—namely the state, society, community, employees, suppliers, clients, and partners.

This Code applies to all employees, suppliers, contractors, and members of the Board of Partners of 7 SEAS ENERGY S.A.S., without exception. Awareness and effective communication activities must be ensured to facilitate understanding and make this Code the framework for behavior for all who act on behalf of the company.

1. Our Values

The desirable ways of being and acting that guide our conduct are as follows:

Honesty: Act truthfully, with transparency and uprightness.

Responsibility: Undertake our activities with timeliness, dedication, and accountability.

Service: Fulfill our duties with warmth, respect, and a genuine desire to help others.

Respect: Recognize and accept our own qualities and those of others, understanding differences, personal beliefs, and fundamental rights.

Teamwork: Combine efforts and share a common purpose to achieve valuable results for our organization, clients, and stakeholders.

Loyalty: Remain faithful to the company and colleagues, with a strong conviction toward the service we provide.

Commitment: Perform our tasks with the best attitude and safely, using our full capabilities to deliver valuable results.

Solidarity: Collaborate with others for mutual benefit, strengthening bonds of friendship and respect.

2. With Our Shareholders and Partners

We strive to establish the best corporate governance practices to ensure transparency and trust for our shareholders. A well-governed, socially responsible, efficient, and profitable company reflects their mandate.

We are committed to providing shareholders with sustained profitability and long-term value creation.

The company complies with all legal requirements to provide shareholders with clear, transparent, and consistent financial information based on sound accounting practices.

CODE OF ETHICS		
Code: GERG-FOR-012	Date: 03/02/2017	Version: 002

We use resources prudently and profitably, upholding the highest ethical and legal standards in all business practices and transactions.

3. With Our Employees

We aim to ensure that every employee is respected and finds a suitable space for both professional and personal growth.

Our relationship with employees is based on the Golden Values: Respect, Justice, Trust, and Affection.

a) Respect for Individuality

We value every individual's unique contribution and prohibit all forms of discrimination based on age, religion, sex, race, sexual orientation, or any other condition protected by law. This principle applies to all aspects of employment—recruitment, promotion, compensation, training, and termination.

b) Development and Values

We foster the personal and professional development of our staff and encourage the appreciation of high moral and ethical standards.

We do not tolerate harassment, favoritism, or bribery. We maintain a workplace free from intimidation, discrimination, and offensive conduct, ensuring trust and stability for our employees.

c) Safety

The life and health of our employees take priority over operational efficiency or results. We are committed to providing a safe and healthy work environment, promoting a culture that preserves physical and mental well-being.

d) Clarity and Accountability in Roles

We ensure employees have the information necessary to perform their roles responsibly and align with company objectives.

e) Labor Organizations

We respect the independence of legitimate labor associations, promoting collaboration and mutual benefit within the framework of local law.

f) Information and Confidentiality

Employees must use company information responsibly and maintain confidentiality, even after leaving the organization.

g) Conflict of Interest

Employees must declare any personal or financial interests that may conflict with company interests. Annual disclosure is required. No employee may hold a financial stake or consultancy position in a competitor, supplier, or client.

CODE OF ETHICS		
Code: GERG-FOR-012	Date: 03/02/2017	Version: 002

h) Integrity and Corruption

We do not bribe, accept, or offer favors. Bribery and gifts compromise results and damage reputation. These actions are illegal and may constitute a criminal offense.

i) Employment of Relatives

Family members may work in the company only if their relationship does not interfere with job performance or hierarchy. Direct reporting relationships or shared processes between relatives are not permitted.

4. With Our Suppliers

• Dealings

We are committed to conducting honest and fair negotiations, without discrimination or impositions. Every Supplier will always be treated according to our Golden Rule: Respect, Justice, Trust, and Affection.

Our commitment includes respectful treatment of supplier representatives and providing the necessary information about the results of bids and tenders so that these processes are transparent and fair.

• Selection and Development

All proposals from our Suppliers are reviewed comprehensively, considering price, added value, quality, and service.

We place the highest value on fair competition during evaluation to select the best partners, consistent with our commitment to build long-term, equitable, and fair business relationships.

We are also committed to protecting suppliers' rights regarding confidentiality of shared information, and we expect Suppliers, in turn, to comply with company policies.

We involve and support our Suppliers, providing information and accompaniment to improve the characteristics of the materials and services we require from them, within a long-term, trust-based relationship.

• Conditions

A principal commitment with our Suppliers is on-time payment for their products and services. To this end, we establish clear payment terms and define stable, simple, and transparent processes that do not lend themselves to misinterpretation or bad practices.

We seek Suppliers who, in each transaction, obtain fair benefits that promote their sustainable development, enabling them to provide a service that evolves in all its elements, not only in price.

Committed to legality in operations, we ensure our Suppliers do not engage in illegal practices such as money laundering, non-compliance with tax, environmental, or social obligations (e.g., social security contributions, taxes, or child labor) in accordance with applicable law. The Company will not

CODE OF ETHICS		
Code: GERG-FOR-012	Date: 03/02/2017	Version: 002

maintain commercial relationships with suppliers who incur in such practices.

We expect our Suppliers to help us deliver products of excellence; therefore, we work with those who guarantee the highest standards of quality and food safety.

The Company promotes care for the environment and biodiversity and therefore expects Suppliers to do the same.

- **Anti-Corruption**

We seek to obtain from Suppliers only the benefits inherent to each negotiation, without personal advantages in exchange for awarding contracts or acquiring goods/services. We will strive to maintain win-win relationships with our Suppliers.

For the Company, the best recognition from a Supplier is fulfilling what was agreed; therefore, neither we nor our family members accept money, gifts, services, discounts, trips, or entertainment. We understand suppliers may promote their brands, products, and services; promotional items are permitted only when their value is symbolic.

Any questionable situation must be reported immediately in writing to the direct manager, and always before carrying out any transaction.

In support of this principle, we invite our Suppliers to adopt our Personal Integrity standard and not offer compensation or gifts to our Employees.

We also provide the “Línea Comenta” as a confidential channel to submit comments, suggestions, and complaints. We commit to thoroughly reviewing each case and acting accordingly. This channel is available before, during, and after the Supplier–Client relationship, with the understanding that we will act fairly and without harming the parties’ interests when complaints are substantiated.

5. With Our Competitors

We are committed to competing in the market based on price, quality, and service, within a framework of integrity, respecting Our Competitors in every respect.

All advertising or promotion is based on the truth and complies with the competition laws of each country. We compete through quality, service, and commercial strategy, in line with Our Principles and Values.

We respect Our Competitors, and whenever we need to speak about them, we will use fact-based information. All comparisons with the competition will be made using accurate terms, without qualifiers, and without employing misleading information or arguments.

6. With the Government

- **Respect for the Law**

We keep ourselves informed of the laws of every country in which we operate and make the

CODE OF ETHICS		
Code: GERG-FOR-012	Date: 03/02/2017	Version: 002

necessary adjustments to avoid any violations.

This principle applies to all business areas without exception.

Failure to comply with the law constitutes an offense that can cause the Company severe economic damage and deterioration of its image.

Whenever possible, we participate in relevant organizations to analyze and understand legislation, always in the most respectful manner and with the spirit of collaboration toward the development of the corresponding country.

• **Respect for Local Customs**

Because we operate in countries with cultures and legal frameworks, we seek to understand and respect local customs and practices, if they do not violate the law, contradict our principles and values, or oppose the provisions of this Code.

If there is any doubt regarding the consistency between Our Values and local customs, the matter must be consulted with the General Director of the corresponding organization to determine the appropriate course of action.

• **Participation in Political Activities**

We do not take a stance on any ideological or partisan affiliation, but we encourage civic participation in professional associations and civic organizations, while also promoting the responsible exercise of political rights.

Participation by employees in political and/or electoral processes shall be entirely personal and may not include contributions of time, financial support, or resources belonging to the Company.

When an employee chooses to participate in politics, make contributions, or express opinions, they shall do so as an individual and must ensure that their actions do not appear to represent or be conducted on behalf of the Company.

7. With Society

We recognize that our reason for being is the society in which we operate; it is to society that we owe ourselves and for whom we work.

For this reason, we promote volunteerism among Our Personnel and are committed—through our daily work and attitudes—to supporting the principles and values that uphold the communities where we live.

• **Generation and Conservation of Employment**

We are committed to the economic and social growth of the communities where our Companies are located, through the creation and maintenance of dignified and productive employment opportunities.

CODE OF ETHICS		
Code: GERG-FOR-012	Date: 03/02/2017	Version: 002

We train Our Employees. As a company, we invest in staff training and do everything possible to retain those who perform their duties properly and maintain a positive attitude.

- **Advertising**

We are committed to ensuring that our advertising campaigns promote universal ethical values, such as family unity, the physical and emotional integrity of individuals, and respect for the universal rights of children, as well as respect for people with disabilities, the elderly, and all ethnic or social groups.

We are aware of the impact of our advertising and therefore ensure that it is always responsible and truthful, avoiding any messages that could lead to misinterpretations regarding nutritional value, use, or product attributes.

- **Environment**

We understand that our operations inevitably have an impact on the environment, and for this reason we are committed to continuously seeking ways to reduce it, through ongoing improvement in emission control, waste management, water treatment, energy saving, and any other element that could potentially cause harm.

We promote among all Our Personnel a meticulous care for the environment and biodiversity, and we recognize responsible practices in their daily work.

8. Productivity

We aim to build a highly productive and fully human company.

We understand that to meet our internal and external responsibilities, we must make productive and sustainable use of our resources.

- **Austerity**

We are convinced that our business and daily operations must be carried out with simplicity.

We are committed to conducting all our business processes under the principle of austerity, making efficient use of available resources, avoiding waste, maintaining them in optimal condition, maximizing their capacity, and extending their useful life.

Our objective is to ensure that expenses are functional and necessary, always respecting the dignity and safety of Employees.

- **Protection of Assets**

Our commitment is to protect and optimize the value of the company's investment, primarily through the prudent and profitable use of resources, ensuring they comply with the relevant safety standards.

The custody and preservation of the company's assets is the responsibility of every member of the organization.

CODE OF ETHICS		
Code: GERG-FOR-012	Date: 03/02/2017	Version: 002

We understand company assets to include not only machinery, buildings, vehicles, and furniture, but also blueprints, designs, formulas, processes, systems, drawings, technology, product launch plans, business strategies, promotional campaigns, and our trademarks.

Employees are committed to safeguarding company assets, particularly intellectual property, represented by manufacturing processes, information systems, marketing structures, financial data, and product or personnel information.

The use of assets must be strictly for business purposes. Any other use is strictly prohibited. All Employees are obliged to report any misuse or deviation that comes to their attention.

Violations of the Code of Ethics

Compliance with this Code is strictly mandatory.

Managers at all levels must set an impeccable example, promote constant dissemination, and take disciplinary measures when any Employee fails to comply with its provisions.

Any Employee conducting business practices contrary to those established in this Code shall be subject to disciplinary actions, which may include termination of employment and/or legal action.

In an international company, it is inevitable that situations may arise that are not foreseen in this Code.

In such cases, our actions should be guided by adherence to the law, Our Values and Principles, and good faith.

Employees shall always have the freedom to consult their supervisors or use the “Línea Comenta” regarding any situation that raises doubts.

The Audit Department will include compliance with this Code as part of its regular reviews.

The Ethics Committee shall report quarterly to the Audit Committee of the Board of Directors.

Functional Departments related to each of Our Stakeholder Groups (Employees, Shareholders, Suppliers, Clients) are responsible for ensuring compliance with this Code of Ethics within their respective scopes.

The Institutional Relations Department shall prepare and implement plans for the dissemination of this Code.

This **Code of Ethics** entered effect on **February 10, 2016**.