

HUMAN RIGHTS POLICY

Blumar and Affiliates

June 2021

FINAL VERSION

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1. OBJECTIVE

The objective of the Human Rights Policy of Blumar S.A., hereinafter Blumar, the Company, or the Enterprise, is to establish, communicate and guarantee the commitment and the responsibilities with respect to the care and respect to the human rights in the area of the entrepreneurial activity it carries out.

2. SCOPE

The scope of this Procedure refers to:

- Blumar S.A.
- Pesquera Bahía Caldera S.A.
- Salmones Blumar S.A.
- Salmones Blumar Magallanes SpA

Hereinafter, said entities will be indicated as “Blumar and Affiliates”.

The declarations and commitments expressed in this document constitute a guideline of conduct for all the directors, administrators, collaborators, contractors, advisors and trainees of the Company as well as those that form part of its chain of value, as is the case of its direct and indirect collaborators, contractors and suppliers.

3. COMMITMENT

The Company is committed with the development and promotion of good practices that lead to the sustainable development, by means of the integran administration of its processes. In each one of its actions endeavors that its activities strength the growth of the country within a framework of good corporate governance, trnsparenc and equity, respecting the legislation, maintaining a collaborative work with its groups of interest, an actng in coherence with the principles of the Globalⁱ and the commitments of sustainability, such as the Objectives of Sustainable Development detailed in the Agenda 2023 in Chile ⁱⁱ In addition, it supports and respects the protection to the human rights, the labor rights and the freedom of association and collective bargaining in its operation in Chile, in accordaance with the principles of the following treatises of International Law:

- Human Rights International Chart of the United Nations Organization (UN).ⁱⁱⁱ
- Universal Declaration of Human Rights.^{iv}
- Fundamental Conventions of the Labor International Organization (WO) numbers 29, 87, 98, 100, 105, 111, 138 and 182, as well as the Declaration of the WLO related to the fundamental principles and rights at work.^v
- UN Convention on Children’s Rights.^{vi}
- Leading Principles on Enterprises and Human Rights of the United Nations. ^{vii}
- Principles of the UN Global Pact.^{viii}

It is also counted with the following internal documents that complement and are related to the principles consigned in this policy:

- Code of Conduct and Entrepreneurial Ethics.^{ix}
- Model of Prevention of Criminal Offenses.^x

4. DECLARATION

The paramount guideline of this policy is to prevent causing or contributing in the adverse impacts, actual or potential, on the human rights throughout its activities. The Company is committed with the respect for the human rights in connection with its different groups of interest, in particular its collaborators, contractors and suppliers. The principles that regulate them are:

Decent work

The more persons are productive and may contribute to the growth of the country, the better for the community. The productive employment and the decent work are key in order to attain a reduction in poverty. As part of the Global Pact Chile, in the Company we are committed with the ODS 8: Decent Work and Economic Growth.

Decent work implies that all the individuals must have opportunities to conduct a productive activity that contributes a fair income, safety at the work site, and social protection for their families; that offer better perspectives for personal development and favor the social integration.

It is also important that all women and men have the same opportunities at the workplace.

The continuous lack of decent work opportunities, the insufficiency of investments and low consumption damage the subjacent basic social contract in the community, which establishes that we all must benefit from progress.

Following, there is a detail of other principles associated to the decent work.

Rejecting of the forced or mandatory labor and children's work

It is rejected the use of any form of forced or mandatory labor and it does not apply any type of action during the work relationship that has as its purpose the retention or workers against their will. Given this, the Company is committed with the respect to the rights of children and rejects the use of infant labor, defining as its policy the not hiring of minors of 18 years.

Respect to diversity and non-discrimination

The Company rejects all form of discrimination and commits to seek that all its workers and collaborators be treated with respect as far their diversity is concerned, promoting the equality of opportunities in any relationship that is maintained with the Company. This commitment is contained in its Code of Ethics.

Freedom of association and collective bargaining

Its relationships are based in the development of a good communication order between the Company and its unions or negotiating teams, and recognizes the right of its workers to organize for the defense and promotion of their interests, and does not interfere in their decisions in this respect. It also promotes the right of representation of the workers on the part of the unions and other forms of representation elected in accordance with the Chilean legislation and the practices in force. In addition, recognizes the importance of the collective bargaining as a voluntary instrument for the determination of contractual conditions, as well as for the regulation of the relationships between the executives and the unions.

Labor safety and health

The Company is committed to guarantee the best conditions of safety and health in all the work sites, promoting the diffusion of a culture of safety, instructing in respect of the conscience of the risk, promoting the responsible behavior on the part of all its workers and collaborators, and generating different formative and informative activities in connection with the matter. In addition, through the development of the Paritary Committees, represented by the workers and the Company, as a collaborative mechanism of continuous improvement. It also works permanently to improve the protection of the safety and health of its workers through the application of diverse preventive measures.

Fair work conditions

It is rejected all type of harassment, threat or intimidation at the work sites, whether of oral, physical, sexual or psychological character, ensuring an environment of positive and respectful work. It recognizes the value of the training for the development of persons and their capacities, encouraging the participation of the workers.

Respect for the rights of the communities

The Company is committed with the respect to the rights of the communities of the territories where its operations are conducted, through the promotion of activities of free and informed consultation. It promotes and actively participates in the public-private work discussions, and with authorities, promoting instances of participation with the community and local authorities.

Privacy and communications

Blumar undertakes to respect the confidentiality and the right to the intimacy of all its workers and maintains the commitment to use in an adequate and respectful manner all the information and data in its possession. It also undertakes to see that all its communications, both institutional and commercial, not be discriminatory and maintain the respect toward the different cultures, giving special attention to not affect negatively the most vulnerable public, as is the infancy.

Taking as reference the Voluntary Principles of Safety and Human Rights, it undertakes to guarantee that the private security services protecting the personnel and the properties of Blumar in the locations where it operates, to act in conformance with the legislation in force and in concordance with the rules of International Law contained in the treaties subscribed and ratified by the Republic of Chile.

Commitment with the inclusion

The Company understands that the work permits, complementarily, to establish social networks and incentivate the social participation. In consequence, the labor inclusion is a first great step for the social inclusion. In addition, it sustains that the labor inclusion improves the work climate when promoting the collaborative work and increases the commitment of the workers. An inclusive environment founded in the mutual respect, the cooperation, and the valuation of all individuals equally, are key elements of the strategy of the Company, and it understands that the inclusion is a common effort among all the actors. In consequence, an inclusive space is a team work.

Blumar undertakes to respect the dignity of the individuals suffering disability, working in their education and training, in order to permit that they may carry out their functions and feel valued and respected. Therefore, it prohibits any act of discrimination toward individuals with disabilities, or of racial, ethnic, religious, sexual orientation or other nature. The Company will endeavor that all individuals have guarantees in the processes of internal and external selection, being a criteria of equality established for applications to positions with apt functions.

5. DIFFUSION AND INFORMATION

This Human Rights Policy shall be diffused and communicated to all persons interacting with the Company, both internally and externally, by the Persons Division. This division is committed the carrying out of formative actions that ensure the correct comprehension of the contents of this policy on the part of workers, collaborators and contractors of Blumar S.A. and its affiliates: Salmones Blumar S.A., Salmones Blumar Magallanes SpA and Pesquera Bahía Caldera S.A.

6. APPROVAL AND UPDATING

This policy was approved by the Board of Directors of Blumar S.A.

CONTROL OF VERSIONS			
Version:	Last Updating:	Approved by:	Description:
1.0	June 25, 2021	Board of Directors of Blumar S.A.	Creation and first version of the document

7. DEFINITIONS

By **forced or mandatory work** is understood any work or service demanded from an individual under the threat of a penalty and for which such individual does not offer voluntarily. (es specified in section 2.1 of Convention 29 of the WIO)

Consult in the Code of Conduct and Entrepreneurial Ethics previously referred to.

By **discrimination** is understood any distinction, exclusion or preference founded in motives of race, color, sex, religion, political opinion, national ascendancy or social origin that produces the effect of annulling or altering the equality of opportunities or treatment in the job and occupation, or any other distinction, exclusion or preference the effect of which is to annul or alter the equality of opportunities or treatment in the job or occupation that may be specified by the interested member with the prior consultation with the organizations representative of employers and of workers, when such organizations exist, and with other appropriate organisms. (as specified in section 1.1 of the Convention 111 of the WIO)

By individual with discapacity is understood “the one that, having one or more physical or mental defficiencies, be it due psychological or intellectual causes, or sensorial, of temporary or permanent character, when interacting with diverse barriers present in the invironment, finds himself or herself prevented or restricted in his or her full and effective participation in the community in equality of conditions with the rest of the individuals”.

i *Revise in:* <https://pactoglobal.cl/nosotros/10-principios-de-pacto-global/>

ii *Eevise in:* <https://pactoglobal.cl/nosotros/10-principios-de-pacto-global/>

iii *Eevise in:* <https://www.ohchr.org/Documents/Publications/FactSheet2Rev.1en.pdf>

iv *Eevise in:* https://www.ohchr.org/EN/UDHR/Documents/UDHR_Translations/spn.pdf

v *Eevise in:* https://www.ilo.org/wcmsp5/groups/public/---ed_norm/---declaration/documents/publication/wcms_467655.pdf

vi *Eevise in:* https://www.ohchr.org/Documents/ProfessionalInterest/crc_SP.pdf

vii *Eevise in:* https://www.ohchr.org/documents/publications/guidingprinciplesbusinesshr_sp.pdf

viii *Eevise in:* <https://pactoglobal.cl/nosotros/10-principios-de-pacto-global/>

ix *Eevise in:* https://www.blumar.com/upload/paginas/archivos/24-12-2018-15-33-23_29-12-2016-15-07-59_codigo_de_etica-min.pdf

x *Eevise in:* https://denuncias.blumar.com/upload/paginas/archivos/16-09-2019-16-02-40_prevecciondelito.pdf