

Subject: GLOBAL ANTI-DISCRIMINATION, HARASSMENT AND

**RETALIATION POLICY** *Effective Date:* April 30, 2021

# 1.0 PURPOSE

The purpose of this Global Anti-Discrimination, Harassment and Retaliation Policy is to provide rules and guidelines to ensure Trident meets its commitment to provide a work environment in which people are treated with dignity, decency and respect; a workplace free of verbal, physical, and visual forms of discrimination, harassment or bullying so that everyone can work in a productive, respectful and professional environment.

# 2.0 AUDIENCE AND SCOPE

All employees, and non-employees on Trident property, regardless of their position, are covered by and are expected to comply with this policy, and to take appropriate measures to ensure that prohibited conduct does not occur. This policy covers conduct in the workplace, at Trident-sponsored social functions (such as holiday parties, picnics, etc.) and business events (such as conferences, trade shows, etc.).

## 3.0 POLICY STATEMENT

Trident Seafoods Corporation is committed to providing a work environment in which people are treated with dignity, decency, and respect; a workplace free of verbal, physical, and visual forms of discrimination, harassment or bullying so that everyone can work in a productive, respectful, and professional environment.

Harassment or discrimination in employment based on sex, race, national origin, religion, age, marital status, pregnancy, sexual orientation, genetics, disability, parenthood, gender identity, citizenship status, veteran status or any other classification protected by local, state, or national law is strictly prohibited. Trident does not tolerate discrimination or harassment of any kind by anyone in the workplace – supervisors, co-workers, or non-employees.

Trident strives to prevent, correct, and discipline behavior that violates this policy by enforcement and educating employees.

Trident maintains a zero-tolerance policy against employment-based retaliation against anyone for raising a concern, making a complaint or participating in the investigation of a complaint.

Managers and supervisors who knowingly allow or tolerate discrimination, harassment, bullying or retaliation, including the failure to immediately report such misconduct to Human Resources, are in violation of this policy and subject to discipline.

#### 5.0 POLICY ENFORCEMENT

Appropriate disciplinary action will be taken against any employee or non-employee who violates this policy. Based on the seriousness of the offense, disciplinary action may include verbal or written reprimand, suspension or termination of employment.

# 6.0 REPORTING AND QUESTIONS

Any known or suspected violations of this policy should be reported immediately to Trident's Human Resources Department. Anonymous reports may also be provided via the confidential EthicsPoint hotline (<a href="http://www.tridentseafoods.ethicspoint.com">http://www.tridentseafoods.ethicspoint.com</a>, 1-855-284-6740 (USA), 400-661-2119 (China), 0800-181-0252 (Germany), or 0800-888-3040 (Japan)). EthicsPoint is available 24 hours a day, 7 days a week. Trident will not tolerate retaliation against any employee who makes a report in good faith.

Questions about this policy should be directed to Trident's Human Resources Department at HR@TridentSeafoods.com.

## 7.0 RELATED DOCUMENTS

This policy and related documents are published on Trident's Global Policy Center intranet site.

#### **EEO Statement:**

Trident Seafoods is an Equal Opportunity Employer. All qualified applicants will receive consideration for employment without regard to race, color, religion, sex (including pregnancy), sexual orientation, gender identity, national origin, disability, protected veteran status, age and genetic information.

Trident Seafoods has adopted a zero-tolerance and drug-free workplace policy.