



Subject: **GLOBAL SUPPLIER CODE OF CONDUCT**

Effective Date: January 1, 2023

GLOBAL SUPPLIER CODE OF CONDUCT

1.0 PURPOSE

Trident Seafoods Corporation (“Trident”) operates with integrity by setting industry high standards to protect our communities, environment, and values. As new challenges arise, we are committed to adapt and adhere to changing regulations and internationally recognized standards in our industry. To provide guidance, our Global Supplier Code of Conduct (“Code”) establishes policies and principles that define how we do business. Regardless of where our business partners are located or what role they fulfill, following the Code is essential to maintain alignment with Trident’s ethical standards.

2.0 AUDIENCE AND SCOPE

All Trident business partners, including suppliers, consultants, sales brokers, and contractors (“Suppliers”) worldwide, regardless of their position, are expected to comply with the Code, and to take appropriate measures to ensure that prohibited conduct does not occur. Suppliers will also take appropriate measures to ensure their supply chain practices reflect ethical behaviors outlined in this Code. Our philosophy is to address and resolve all problems brought to our attention to maintain mutually beneficial business relationships.

3.0 BUSINESS ETHICS

3.1 Compliance with Laws and Regulations

Suppliers shall comply with all applicable local, state, federal, and international laws, codes, and regulations including, but not limited to those pertaining to business ethics, compensation, and benefits, working and living conditions, product quality, safety, and environmental protection.

3.2 Sanctions

Suppliers shall not directly or indirectly provide Trident any material or service from a country, person, or entity that is subject to U.S. and other regional, unilateral, and multilateral regulations that restrict transactions with specific foreign entities, persons, or countries (often referred to as sanctioned, denied, debarred, and/or restricted parties). Suppliers must ensure that neither they nor their officers nor directors nor owners appear on any applicable sanctions list. Some examples may

include, but are not limited to, the following: Specially Designated Nationals (SDN) and Other Blocked Persons list, the Sanctions Programs list, and the non-SDN Entities list, all maintained by the U.S. Department of Treasury, and the Denied Persons list maintained by the Bureau of Industry and Security (BIS). Suppliers shall implement due diligence compliance practices to screen their employees, customers, suppliers, vendors, agents and other business associates, including all parties in each transaction such as banks, insurance companies, shipping lines, and freight forwarders to ensure compliance with applicable laws and regulations concerning embargoes and sanctions.

3.3 Bribery and Corruption Prevention

Suppliers may not participate in, encourage, or permit any forms of corruption, bribery, extortion, or embezzlement. Suppliers are expected to have adequate controls and procedures to prevent bribery and corruption and at all times to comply with anti-bribery laws and conventions including the Foreign Corrupt Practices Act (FCPA) in the United States, the Organization for Economic Cooperation and Development (OECD) Anti-Bribery Recommendation in Europe, and the Bribery Act in the United Kingdom.

3.4 Payment and Gifts

Trident employees are prohibited from personally receiving checks, cash, or any other forms of payment from Suppliers or their associates. All business payments shall be made directly to Trident's corporate office or as otherwise directed. Gifts to employees should be of a nominal value and should not be for the purpose of obtaining undue influence over purchasing or other business decisions.

3.5 Proprietary Information and Disclosure

Protection of proprietary and other sensitive information is the responsibility of Suppliers. Suppliers must treat information pertaining to Trident's business concerns as confidential. Suppliers should promptly alert Trident of any activity that could disrupt or negatively affect business or operations and of any breach of confidentiality.

3.6 Ethics Hotline

Trident does not tolerate unethical activity. Employees and Suppliers are encouraged to report any known or suspected ethical or compliance concerns. Suppliers are encouraged to report any concerns directly to Trident's Legal Department (contact information below), or anonymously through our confidential EthicsPoint hotline:

Website: <http://www.tridentseafoods.ethicspoint.com>

Telephone: USA: 1-855-284-6740; China: 400-661-2119; Germany: 0800-181-0252 ; or Japan: 0800-888-3040

4.0 HEALTH AND SAFETY

4.1 Working Conditions

Suppliers shall provide employees with a safe and healthy working environment. This includes, but is not limited to, company-supplied personal protective equipment (PPE), food safety equipment, as well as annual health, safety, fire, and other emergency preparedness inspections and procedural training. Training and health checks for every employee should be maintained.

4.2 Living Conditions

Where Suppliers provide housing, a healthy, sanitary, and safe living environment for employees in accordance with all applicable local, regional and national laws and regulations is expected. This includes, but is not limited to, hygienic facilities with adequate toilets, showers, and sinks, as well as privacy devices in bathroom stalls and showers, accessible potable water, sufficient floor area per person in sleeping rooms, and maintained fire equipment in accordance with local laws.

4.3 Global Human Rights

Suppliers shall adhere to Trident's Global Human Rights policy, which is incorporated herein by reference.

5.0 FOOD AND FOOD PRODUCTS

5.1 Food Safety

All Suppliers of food and food product shall conform to government and industry regulations and best practices for food safety. Suppliers shall operate in accordance with Hazard Analysis Critical Control Points (HACCP) Principles compliant with U.S. FDA regulations. Suppliers shall be, or have a defined plan to become, certified against a Global Food Safety Initiative (GFSI) food safety standard. Suppliers that are not certified or have lost GFSI certification are subject to a risk assessment conducted by Trident and/or a third-party contracted by Trident on a plant-level basis. Suppliers to Trident must demonstrate a culture which prioritizes food safety.

5.2 Lacey Act Compliance

The Lacey Act is a U.S. conservation law that prohibits trade in wildlife, fish, and plants that have been illegally taken, possessed, transported, or sold.

Seafood Suppliers shall not handle or sell product that has been imported, exported, transported, sold, received, acquired, or purchased in violation of any foreign or domestic law.

5.3 Import Regulations

Import seafood Suppliers are expected to have an adequate process for maintaining and/or completing all relevant documentation including records, accounts, bills of lading, invoices, labels, tags, packing lists, FDA facility registration and import declarations in an accurate and truthful manner in order to maintain full compliance with the Lacey Act, FDA Fish and Fishery Products regulation (21 CFR 123), and any current or future U.S. import laws and regulations.

6.0 ENVIRONMENT

6.1 Environmental Compliance

Suppliers' operations shall comply with applicable local, state, and federal environmental laws and regulations.

6.2 Process Improvement

Suppliers are expected to continuously focus on innovation necessary to improve technology, increase energy efficiency, and reduce greenhouse gas emissions and water and other resource consumption, and to incorporate such innovations into any product or service provided to Trident as soon as reasonably practicable.

6.3 Environmental Stewardship

Suppliers are expected to operate in a manner to promote environmentally friendly business practices that minimize negative impacts on the environment while supporting sustainability and conservation.

7.0 COMPLIANCE

7.1 Reviews and Inspections

Suppliers should conduct reviews and inspections to ensure compliance with this Code and applicable legal and contractual standards. Non-compliance with this

Code will subject violators to disciplinary action, which could include termination of the Supplier relationship and restrictions on future business. Any noncompliance with this Code should be immediately disclosed to Trident's Legal Department, along with planned remediation actions. Trident reserves the right to inspect or select and hire a third-party auditor to inspect any Supplier controlled facility at any time to audit Supplier's compliance with its contractual obligations and this Code. Supplier agrees to allow Trident, or its selected third-party auditor, full access to facilities and employees, and to provide full disclosure of all information pertaining or relating to any Supplier practices in the supply chain of any product or services supplied to Trident.

7.2 Notification to Employees

To the extent required by law, Suppliers should establish company-wide policies implementing standards outlined in this Code, and post notices of those policies for their employees.

7.3 Application

This Code is a general statement of Trident's expectations with respect to its Suppliers. It should not be read in lieu of but in addition to the Supplier's obligations as set out in any agreements between Trident and the Supplier. In the event of a conflict between this Code and an applicable agreement, the agreement shall prevail.

8.0 REVISIONS

Trident reserves the right, at its sole discretion, to update and/or revise this Supplier Code of Conduct from time to time. Trident shall provide Supplier with updated copies and/or post updates on its website. By continuing to supply product to Trident, Supplier shall be deemed to accept any updates or revisions to this Supplier Code of Conduct.

9.0 REPORTING AND QUESTIONS

Any known or suspected violations of this policy should be reported immediately to Trident Legal at LegalNotice@TridentSeafoods.com. Anonymous reports may also be provided via the confidential EthicsPoint hotline (<http://www.tridentseafoods.ethicspoint.com>, 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 Corporate Social Responsibility at CSR@tridentseafoods.com.

10.0 RELATED DOCUMENTS
Trident Global Human Rights Policy
Trident Global Sustainability Statement

SUPPLIER ACKNOWLEDGMENT

Acknowledgment and Acceptance:

By my signature below, I acknowledge and agree that (1) I have read and understand Trident's Global Supplier Code of Conduct and Human Rights Policy; (2) I am a representative of _____ ("Supplier"), authorized to make the commitments on behalf of Supplier stated herein; and (3) Supplier shall comply with the terms of Trident's Global Supplier Code of Conduct and Human Rights Policy.

Signed and agreed to this _____ day of _____, 20_____.

_____ (signature)

By: _____
Printed Name

Position: _____
Title and contact information

For: _____
Supplier Name