



Subject: GLOBAL BRIBERY AND CORRUPTION PREVENTION POLICY
Effective Date: April 30, 2021

1.0 PURPOSE

Trident Seafoods is committed to strict compliance with the anti-bribery and anti-corruption laws everywhere in the world that Trident does business. The purpose of this Bribery and Corruption Prevention Policy is to provide rules and guidelines to ensure Trident meets this commitment.

2.0 AUDIENCE AND SCOPE

This policy applies to all employees of Trident Seafoods and its subsidiaries and affiliates (collectively "Trident").

3.0 POLICY STATEMENT

Trident and its employees shall conduct all business in an ethical, professional and honest manner and act with integrity in all business dealings and relationships, wherever Trident operates. Trident has zero-tolerance for bribery and corrupt activities including the offer or acceptance of any form of undue influence that may be interpreted as bribery or corruption.

Trident will comply with all applicable laws relating to anti-bribery and anti-corruption in all the jurisdictions in which we operate. This includes the U.S. Foreign Corrupt Practices Act, which broadly applies to conduct by anyone in the U.S., as well as to all U.S citizens, residents, and U.S. companies and their foreign subsidiaries, no matter where in the world the prohibited conduct occurs. Every country and U.S. state in which we operate has laws which prohibit bribery. To ensure Trident's compliance, Trident prohibits all bribery, including any that involves government and public officials as well as private sector (commercial) entities or individuals. Any instance of suspected bribery or corruption should be immediately reported to Trident's General Counsel.

3.1. What is Bribery?

Bribery is the offering, promising, giving, asking, accepting, receiving or requesting anything of value with the intent to wrongfully induce or influence a decision or action of another party.

It does not matter whether the bribery is direct, indirect, passive, implied, or conducted through a third party (such as an agent, consultant or distributor). Trident will not engage in any form of bribery anywhere in the world and will avoid any situation or activity that could give even the appearance of bribery.

3.2. What can be considered bribe?

A bribe can be anything of value offered to influence or induce an action or decision by another party. A bribe can take many forms including the following:

- cash or a cash equivalent
- services
- luxury items or other unreasonable gifts
- excessive travel, entertainment or hospitality
- tuition or membership fees
- kickbacks
- offers of employment
- unwarranted rebates or excessive commissions
- unwarranted allowances or expenses
- charitable donations
- political contributions
- uncompensated use of company services or facilities
- facilitation payments or payments made to perform normal job functions more quickly and/or to prioritize a particular customer.

Whether or not something is a bribe depends on the circumstances of its offer or acceptance. If you are ever uncertain about whether something is bribe or a legitimate gift or act of hospitality, you should seek immediate guidance from the Trident's General Counsel or Legal Department before offering or accepting any such item.

3.3. Specific Situations: What is and What is Not Acceptable?

3.3.1. *Gifts/Hospitality/Expenses*

Gifts, hospitality, promotional, and similar business expenditures can be used as or considered bribes in certain circumstances. Trident prohibits the giving and receiving of hospitality or business gifts and related expenses (i) when the intention of the hospitality or gift is to gain an improper advantage; or (ii) to induce or reward a business decision or action; or (iii) when the act of giving or receiving hospitality or gifts places the recipient under any obligation.

Trident employees must never accept payments, rebates, checks, or cash directly from customers or vendors. All payments should be made payable to Trident Seafoods and paid electronically or by mail in accordance with Trident's Accounts Payable Department (AP) rules.

Gifts and hospitality should only be provided or accepted for legitimate business purposes. Under Trident's Policy, all hospitality and business gifts given or received must meet the following guidelines:

- be reasonable and customary;
- not be timed in coincidence with a business decision;
- not be offered in expectation of favorable treatment;
- be of reasonable value in the circumstances;
- be provided only to reflect esteem or gratitude;
- be given openly and transparently;
- be properly reported and documented in Trident's books and records

- with appropriate receipts;
- be permitted under U.S. law and all other applicable laws;
- comply with the rules and policies of both the giving and receiving organizations;
- should be an infrequent occurrence between giver and recipient;
- may include modest meals with people with whom Trident does business;
- may include the occasional provision of attendance at sporting or cultural events if intended to build constructive business relationships rather than to receive or confer an advantage;
- may include the provision of small promotional gifts, such as Trident branded pens, cups, notebooks, and calendars; and
- be properly reviewed and approved in advance by Trident management.

The rules for giving gifts, entertainment, travel or hospitality to anybody working for any government or public organization are stricter than those that apply to private individuals and organizations. Always obtain approval from an executive team member or the Trident Legal Department before giving or offering anything of value to a government employee or foreign official of any rank or level.

3.3.2. *Facilitation Payments*

Facilitation payments are generally prohibited by Trident regardless of whether they are permitted by local law. Facilitation payments are payments to public officials to expedite the performance of duties of a non-discretionary nature. These payments are intended to influence only the timing of the public officials' actions (e.g., payments to expedite the issuance of a visa or clearing goods through customs), but not their outcome.

Certain expediting fees may not be considered facilitation payments and may be legitimate payments for faster service. If a public official is offering an expediting fee and the fee is: (1) scheduled, posted or advertised to the general public, (2) payable by check or credit card or other traceable transaction, and (3) documented by a receipt or invoice, then the fee is most likely permissible. If any of these elements are missing, there is a greater chance that this fee is improper and should not be paid.

If in doubt about whether a particular payment would be considered a prohibited facilitation payment, please contact Trident's Legal Department.

3.3.3 *Political and Charitable Contributions*

Political and charitable contributions can be used to conceal corrupt payments and must be handled with caution. To minimize the risk of a perceived bribe, Trident requires appropriate vetting and investigation be conducted into all potential recipients of such contributions to ensure there is no improper

relationship with the entity receiving the contribution and that such contributions will not be used to gain any form of undue influence. Any such contributions must be made only in accordance with applicable legal requirements, be fully documented, and have the prior approval of a member of the executive team.

Trident shall make no political contributions, directly or indirectly, with corporate funds or assets to any foreign government official or political party, or candidate for a foreign political office regardless of whether the contributions are legal under the laws of the country in which they are made.

3.3.4. *Third Parties*

Trident can be held accountable for bribes made by third parties that have been hired by Trident. To prevent bribery by third parties acting on behalf of Trident, all business partners, including vendors and joint venture partners, must be fully vetted with proper due diligence to ensure that business transactions and relationships conducted on Trident's behalf will be transparent and ethical. Once hired, third parties should be monitored to ensure their continued compliance with Trident's policies. The following are some "red flags" that could indicate that a third party engages in unethical business practices:

- requests by a third-party agent or consultants for excessive commissions
- unreasonably large discounts made to third-party distributors
- vague consulting agreements that do not specifically describe services
- third parties that are related or closely associated with a government or public official or others with whom Trident does business
- a third party that becomes part of a transaction at the express request of a government or public official
- a third party that is merely a shell company incorporated in a foreign jurisdiction
- a third-party that requests payments to offshore bank accounts
- a third party with a reputation or history of illegal or corrupt behavior or other activities inconsistent with Trident policies and values

A third party exhibiting such "red flags" will not be retained by Trident. Concerns about the conduct of any third party should be immediately reported to Trident's Legal Department.

3.4. International Laws

As a global company, Trident and its employees must ensure they do not violate anti-corruption laws anywhere Trident does business. In addition to the U.S. Foreign Corrupt Practices Act, Trident and its employees may also be subject to the other anti-corruption laws around the world, including the Bribery Act of 2010 in the United Kingdom; the Anti-Unfair Competition Law and criminal laws in China; the Unfair Competition Prevention Act in Japan; and the anti-bribery criminal and corporate laws

in European and South American countries. Trident will maintain compliance with all applicable international laws.

3.5 Record Keeping

Every type of gift, hospitality, expense, or any other payment by Trident must have complete supporting documentation that adequately describes the true nature of the transaction, including date, amount, business purpose or reason, and full address of the payee or payor. Supporting documentation must be retained in accordance with the Trident's records retention policy.

4.0 EMPLOYEE RESPONSIBILITIES

All Trident employees have a responsibility to prevent corruption or even the appearance of corruption. To do this, all Trident employees must:

- Always comply with Trident policies and all applicable laws;
- Understand that Trident's policies may be more stringent than required by applicable laws;
- Comply with Trident's internal controls;
- Ensure all reporting and records are complete and accurate;
- Be aware of all parties who are involved in a transaction;
- Follow Trident's vetting and due diligence policies and procedures;
- Conduct business only with partners proven to be open and ethical;
- Monitor the activities of third-party partners to ensure compliance with Trident policies;
- Always be honest and transparent in interactions with public officials; and
- Immediately report any activity that you suspect may violate our policies or the law.

5.0 ENFORCEMENT AND REPORTING

5.1 Policy Violations

Any violation of this Bribery and Corruption Prevention Policy is grounds for discipline up to and including termination.

5.2 Violations of the Law

Failure to comply with anti-bribery and corruption laws can result in serious consequences for both Trident and involved employees, including the following:

- Substantial fines against Trident and individuals (fines against individuals cannot be paid by the employer);
- Criminal penalties against Trident;

- Criminal prosecution of individuals, including imprisonment; and
- Court-ordered unwinding of deals, court supervision of programs, and/or disqualification from contracts with government agencies.

6.0 MONITORING AND REVIEW

Management is responsible for enforcement of this policy. All transaction reviewers and approvers are responsible to ensure adequate and complete documentation and legitimate business purposes exist for all approved gifts, hospitality, contributions, etc.

Accounting is responsible for maintaining complete and accurate records that accurately reflect the financial position of the company and underlying transactions. **Treasury** is responsible for maintaining all company bank accounts.

Sales and **Credit** are responsible for performing due diligence for customers, especially those receiving credit. **Procurement** is responsible for obtaining adequate documentation from new vendors and for performing adequate due diligence for new business partners.

Human Resources is responsible for coordinating periodic employee training and communication reminders of this policy. **Internal Audit** is responsible for performing periodic reviews of the sales, procurement, and accounts payable processes (including travel and expense) to help ensure this policy is followed.

7.0 REPORTING AND QUESTIONS

Any known or suspected violations of this policy should be reported immediately to Trident's General Counsel. 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 or legal requirements should be directed to Trident's Legal Department by contacting Trident's General Counsel or LegalNotice@TridentSeafoods.com.

8.0 RELATED DOCUMENTS

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