



## **CODE OF CONDUCT:**

*Our Values and Standards*

## CODE OF CONDUCT: CORE VALUES AND STANDARDS



*Dear Fellow Employee:*

Our mission at Tri Marine is to be the world’s premier supply chain for wild-caught tuna and other seafood products. We set ourselves apart through our commitments to environmental sustainability, social responsibility, and economic success. It’s our hard work and commitment to these principles that make Tri Marine the world-class company it is today.

Every day, we strive to be a great company with unwavering integrity. Our success in this is dependent on all of us holding ourselves accountable to the Tri Marine Code of Conduct. That Code guides our business standards and defines what is expected of all of us.

Over the years, driven by that Code of Conduct, we have developed a high-performance culture and many unique partnerships. We place great value in professionalism, diversity, and inclusion. We have high expectations for our supply chain, who are expected to share our commitment to integrity and to participate in our sustainability programs – from fishing and processing to sales and marketing.

This commitment to Tri Marine’s mission and values enables us to catch and process the highest-quality tuna in full compliance with all laws and regulations, while acting in the best interests of business partners who share our values.

All Tri Marine employees are responsible for understanding and complying with our Code of Conduct, company values, and business standards. As Tri Marine employees, we share a responsibility to raise compliance and ethics concerns through our established channels, so that Tri Marine continues to be a world-class company filled with great people who are proud of being part of it.

No matter how we change and grow, the core of who we are—embodied in our values and standards—will remain constant. And those values and standards will always be the basis of our success.

*Renato Curto*

President & CEO



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## **1. PURPOSE**

Tri Marine is governed by our core values. This Code of Conduct is shaped by our values and defines our culture. How we operate is as important as what we do, and we hold ourselves to the highest level of ethical standards. We publish this Code of Conduct, so every employee of the Tri Marine Group can understand corporate expectations, as well as to guide our business standards and practices.

### **1.1 APPLICABILITY**

This Code of Conduct and our supporting corporate policies apply to everyone who conducts business on behalf of the "Tri Marine Group" — that is, Tri Marine and all its affiliates worldwide including their employees, executive officers, board members, agents, consultants, and contract workers.

**Each affiliate in the Tri Marine Group is required to comply with this Code of Conduct. Therefore, references to “Tri Marine” and the “Group” include all affiliates of the Group.**

### **1.2 ACCOUNTABILITY**

Each of us is responsible for adhering to the Core Values and Standards outlined in this Code of Conduct, and for seeking guidance when we are uncertain as to application of these values, or whether our standards are being met.

Violations of the code can result in corrective action, and in some cases will result in disciplinary action up to and including termination of employment.

### **1.3 RESOURCES**

This Code of Conduct serves as a guide for making ethical decisions in conducting our business. It is not intended as an exhaustive description of Tri Marine policies and standards. Contact your company Human Resource Manager if you have questions relating to company policies.

## 2. CODE OF CONDUCT AND COMPANY IDENTITY

### 2.1 VALUES

**INTEGRITY:** Establishing an honest and firm adherence to moral and ethical practices by holding ourselves accountable to the standards of those who have invested in us as an organization.

**LOYALTY:** Dedication to our customers, suppliers, shareholders, fellow employees, other partners and our company; to protect the organization and the future of all the stakeholders involved.

**STEWARDSHIP:** We acknowledge we live in a shared global society without environmental borders, and we have an obligation beyond any law to take care of the resources that we harvest.

**COMPASSION:** We value the lives and livelihood of our fellow employees and their families. We are dedicated to the fair treatment, safety and wellbeing of those we count as members of our Tri Marine community.

### 2.2 WHO WE ARE

**LEADERS IN INDUSTRY:** In a world that is ever more connected by technology, and affected by climate and environmental concerns, we are responsible for acknowledging when change is needed. We shall lead the way with innovative solutions to provide for sustainable fisheries and healthy oceans.

**A COMMUNITY:** Tri Marine is a group of companies that operates as a community for the benefit of all. Through cooperation we operate under the values of fair treatment of our employees, based on compassion and loyalty. These values help ensure the longevity of Tri Marine, and the future livelihood of all those who are part of the community.

**CONCERNED CITIZENS:** As global citizens, we have a responsibility to look out for the world around us. We can do this by being part of the conversation about our challenge to create a sustainable yet economically viable industry. We will always work hard to be part of the solution to this challenge and commit to conserving our resources and the environment.

**AN HONEST BUSINESS:** We believe in fair competition and the value this provides our customers. We believe in a market that does not exclude others. We operate with confidence and integrity, free from corruption and anti-competitive behavior.

**Decision Test:**

When applying our values and this Code of Conduct to an actual decision you face, consider using a “decision test.”

Ask yourself:

- Does the action comply with the letter of our standards and policies?
- Does the action comply with the spirit of our standards and policies?
- How would the action look as a media headline?
- What would be the public's reaction to the above headlines?
- Is the action legal?

**If you are unsure about what to do, refer to your manager.**

### **3. CODE OF CONDUCT**

This Tri Marine Code of Conduct is an established set of principles and ethical standards for us to conduct global business. It sets out basic principles to guide all Tri Marine employees, officers, vendors, subsidiaries and business partners. All Tri Marine employees and officers must conduct themselves in a manner consistent with this Code.

Tri Marine is a multinational organization; our operations and employees are subject to the laws and common practices of many countries and cultures around the world. Tri Marine employees, officers, and business partners must comply with all applicable laws in the jurisdictions where they work. If you are unsure of what to do in any situation, seek guidance from management before acting: if in doubt, ask first, act later.

Reports of potential misconduct will be taken seriously and investigated promptly, thoroughly and legally. Tri Marine will not retaliate against anyone for making a good-faith report.

#### **3.1 SOCIAL RESPONSIBILITY**

##### **a) General**

In our mission to create an economically viable and sustainable industry we have partnered with various sustainability, humanitarian and environmental organizations to improve the industry and the quality of products provided by Tri Marine. As members of the Seafood Task Force and the International Seafood Sustainability Foundation we are committed to participating in and adhering to the standards set forth by these groups in the effort to protect workers and the environment. These standards have influenced the development of Tri Marine's Code of Conduct and shall be adhered to. This Code will be updated periodically to ensure relevance and alignment with our partners.

Tri Marine seeks to provide customers around the world with safe, high quality, sustainable fish and seafood products while respecting employee safety and welfare and the environment, in addition to striving for economic viability and competitive advantage.

While this Code of Conduct sets out Tri Marine's values and standards, our expectation is that all our business partners, including vendors and suppliers, also comply to maintain a positive working relationship with the Group.

Tri Marine's policy is to conduct all its business in a lawful, highly principled and socially responsible way. Tri Marine will not knowingly conduct business with others that do not respect their ethical, social, environmental, legal, financial or humanitarian responsibilities. Tri Marine expects its employees and business partners to comply with the following policies:

- Business partners must provide a safe and healthy working environment for their employees while complying with applicable laws.
- Discrimination in any form is forbidden.
- Illicit traffic in narcotics, drugs and psychotropic substances is forbidden.
- Illicit trafficking in natural resources — natural resource crimes where natural resources are harvested, transported, trafficked or traded in violation of environmental protection or nature conservation/management laws — is forbidden.
- Illicit trafficking in ozone-depleting substances and hazardous waste, illegal transport or dumping of hazardous waste, and trafficking in/release of ozone-depleting gases is forbidden.
- Compliance with applicable anti-bribery/corruption laws is required.

**b) Child Labor**

The use of child labor is strictly prohibited. The term "child" refers to any person under the age of 15, or under the age of completing compulsory education, or under the minimum age of employment in the country, whichever is higher.

To address potential circumstances of child labor, the employer, and suppliers, subcontractors or agents acting on its behalf have a child labor remediation policy and procedure, promoting the protection of the potential child workers.

Sea-Based Work: No person shall be employed under the age of 18 for sea-based work or as required by law, whichever is higher.

**c) Forced Labor**

Forced, bonded (including debt bondage) or indentured labor, prison labor, slavery or trafficking of persons is prohibited. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services. All work must be voluntary, and workers shall have the freedom to terminate their employment at any time without penalty, in line with prevailing laws and regulations.

Sea-Based Work: Crew members shall have the freedom to terminate their contract at the next regularly scheduled port visit.



**d) Employment Contracts or Agreements**

Written contracts or agreements of employment, shall be provided to workers in a language understood by them; clearly indicating their rights and responsibilities and conditions of employment, including wages, benefits, working hours, locations of the work, living conditions, housing and associated costs, work-related hazards, and other working and employment conditions. These contracts or agreements should be consistent with local laws and practices.

Workers shall be provided with a copy of the signed employment contract or agreement prior to deployment. Workers with difficulty understanding the written contract or agreement shall be given a verbal explanation of the contract or agreement terms and conditions.

The required notice period for workers to terminate their contracts or agreement, shall not exceed what the law requires or one month if no local law applies.

Workers shall not be penalized for termination of their employment contract or agreement upon giving notice.

**e) Freedom of Movement and Personal Freedom**

Workers shall have unrestricted access to basic necessities such as clean drinking water and toilets during both work and non-work hours at the work site or in employer-provided or -arranged housing.

Workers' freedom of movement shall not be unreasonably restricted. Workers shall not be physically confined to the workplace or in premises such as, but not limited to, employer or recruiter - operated residences; nor shall any other coercive means be used to restrict workers' freedom of movement or personal freedom.

Mandatory residence in employer-provided or recruiter-arranged facilities shall not be made a condition of employment, unless required by law.

**f) Retention of Personal Documents**

All workers must retain full and complete control over their original copies of their personal documents. Confiscating, destroying, withholding or otherwise denying workers' access to their identity or immigration documents, including work permits and travel documentation (e.g. passports), is strictly prohibited.

Sea-Based Work: In cases where personal documents are given to boat captains for safekeeping during sea-based work, workers must receive their documents once docked, or at any time requested.

**g) Recruitment Fees**

Workers shall not be required to pay recruitment and hiring-related fees to employers, agents or labor broker outside legally allowed fees. All fees charged to workers must be disclosed in advance and documented in a language that the workers understand.

**h) Humane Treatment**

Every worker shall be treated with respect and dignity. No worker shall be subject to any physical, sexual, psychological or verbal harassment, abuse, violence, or intimidation. Any disciplinary action exceeding legal restrictions such as imposing work, illegal fines, wage deductions and reductions in benefits as means of disciplinary action are strictly prohibited.

**i) Workplace Equality**

All workers, irrespective of their nationality, legal status, or other personal characteristic, shall be treated fairly and equally. Migrant workers shall benefit from conditions of work no less or more favorable than those available to country nationals, including but not limited to wages, hours, duties and accommodations.

**j) Freedom of Association**

The employer respects the rights of workers to associate and bargain collectively and enables workers to exercise their rights in accordance with applicable law. The employer facilitates alternative means of independent and free association and bargaining for all such workers such as worker representatives and worker welfare committees, even in cases where the right to associate and collectively bargain is restricted by law.

**k) Grievance Procedure**

An effective, confidential grievance process shall be established that provide a means by which any worker, acting individually or with other workers, can submit a grievance without suffering prejudice or retaliation of any kind. The grievance procedure shall include a non-retaliatory appeals process for workers who disagree with how a grievance is resolved.

**l) Wages and Benefits**

All workers shall be paid at least the minimum wage required by applicable laws and shall be provided all legally mandated benefits. In the absence of a legal minimum wage, workers are paid at least the industry prevailing wage.

Wage payments shall be made at regular intervals, but not less than once a month, and directly to workers, in accordance with applicable law and shall not be delayed, deferred, or withheld.

At time of payment, workers shall receive a wage statement or pay slip.

Only deductions, advances, and loans authorized by applicable law are permitted and, if made or provided, shall only be taken with the full consent and understanding of workers. Information shall be provided to workers in a language they understand about hours worked, rates of pay, and the calculation of legal deductions and must be written into their employment contract or agreement.

All workers must retain full and complete control over their earnings. Wage deductions must not be used to keep workers tied to the employer or to their jobs. Workers shall not be held in debt bondage or forced to work to pay off a debt.

Deception in wage commitments, payment, taxes and withholding, advances, and loans is prohibited.

The freedom of workers to dispose of their wages as they choose is not limited in any way.

**m) Working Hours**

Workers shall not be required to work more than the number of hours permitted by law and/or collective agreements, whichever affords the greater level of protection for workers.

For land-based work: Workers shall be provided with weekly rest as required by law. Where the law is silent, normal working hours shall not exceed eight per day and 48 per week, total working hours including overtime shall not exceed 60, and one day of rest per seven-day work period shall be provided.

All overtime shall be voluntary. No worker shall be made to work overtime under the threat of penalty, dismissal, or denunciation to authorities. No worker shall be made to work overtime as a disciplinary measure, or for failure to meet production quotas.

**n) Worker Awareness and Training**

Workers must be made aware of their rights and responsibilities at the time of hire, including the terms and conditions of their employment contract, the provisions of this Code and all applicable laws and regulations of their home country, the country where the work is performed, and of any country and jurisdiction contracting the work.

Workers must be trained upon arrival in the receiving country on the employer's workplace rules and procedures, the grievance process, the housing arrangements (if provided or arranged by the employer), and the conditions of work, including any health and safety hazards and the precautions needed to protect personal safety.

**o) Private Employment Agencies & Recruiters**

Employers shall hire workers directly whenever possible. When the subcontracting of recruitment and hiring is necessary, employers shall ensure that the labor agencies they engage operate legally, are certified or licensed by the competent authority in their country of operation, do not charge the worker illegal recruitment fees, use only workers trained on the Code and legal rights, and do not engage in fraudulent recruitment practices that make workers vulnerable to labor exploitation and abuse.

**p) Health and Safety**

Employers shall provide workers with safe and hygienic working and living environments in accordance with prevailing industry standards, paying special attention to prevention of accidents and incidences, management of identified hazards, fire safety, emergency procedures, worker training, first aid and access to medical services, personal protective equipment, equipment and electrical safety, noise, lighting and ventilation, sanitation, access to clean drinking water and food preparation hygiene. Reporting of unsafe conditions or potential hazards shall be made as soon as possible and reasonable steps should be taken to mitigate the hazard until permanent fixes can be put in place. Employees shall have the option of reporting directly to their manager, who will then be responsible for action, or to company management.

### 3.2 CORPORATE RESPONSIBILITY

#### a) Compliance with Laws

Obeying the law, in both letter and spirit, is the foundation upon which Tri Marine's ethical standards are built. All officers, employees and business partners must comply with all applicable laws and regulation. "Applicable laws" means the laws of the place of business. Because Tri Marine is headquartered in the United States, several important U.S. laws apply to Tri Marine operations worldwide.

#### b) Protection and Proper Use of Company Assets

Fraud, waste and abuse of company assets can place the future of the company and the livelihood of fellow employees at risk. Due diligence must be taken by all employees, officers, and business partners to protect Tri Marine assets and ensure their efficient use. Use of Tri Marine assets are for legitimate Company purposes only. Any suspected incident of fraud, waste or abuse of company property, product or equipment should be immediately reported to management for investigation.

#### c) Record-Keeping, Financial Controls/ Disclosures, Reimbursements

To operate with the highest level of integrity it is imperative that we show our commitments to be an honest business. In this manner, Tri Marine keeps accurate accounting records. Our books must accurately and fairly reflect our assets, liabilities, revenues and expenses. All Company accounting records and reports produced from those records must be retained and made readily available to appropriate members of management and regulators when required by law. "Creative accounting" shall not be tolerated. Any attempt or request to make changes to historical records or accounting books that does not accurately reflect truthfulness must be reported to senior group management.

All employees, officers and business partners are required and expected to demonstrate financial integrity.

**d) Trade Issues**

The United States and all other countries have international trade laws, including measures that may impose boycotts and trade sanctions against certain governments or regions. It is Tri Marine's policy to comply with all national and international trade laws, including any trade sanctions and restrictions. Because Tri Marine is headquartered in the U.S., certain US trade sanctions may apply to all group companies and affiliates. The U.S., EU and other jurisdictions also maintain complex regulatory regimes over general importing and exporting of goods. Among other areas, these rules impose specific procedures with respect to product classification, country of origin markings, valuation, and applicable duty rates that may apply to Tri Marine operations.

Tri Marine has procedures in place to ensure that all personnel understand and follow applicable trade rules. These procedures may prohibit the Company from engaging in business relating directly or indirectly to specified countries. If you have any doubt as to which prohibitions are currently in place, please check with your Manager.

**e) Global Anti-Corruption**

Tri Marine is committed to conducting business with honesty and integrity. We carry out operations and activities, both inside and outside the U.S., in compliance with the applicable domestic and foreign laws, rules, and regulations, including the U.S. Foreign Corrupt Practices Act (FCPA), and the U.S. Travel Act. All Tri Marine employees, officers and third parties acting on Tri Marine's behalf are expected to comply with all applicable laws in addition to this Code of Conduct, and the Global Anti-Corruption guidelines as set forth below.

If you have any questions about what this set of guidelines, the Company Code of Conduct, or the applicable domestic and international laws and regulations require, or if you have any suspicion that a possible violation has occurred or may occur contact Tri Marine Group Senior Management for appropriate legal advice.

**i. Bribery**

Bribes can be *anything* of value including entertainment and gifts given (usually to an agent of the government or a political party) for an improper purpose or to influence the performance of a specific activity.

Tri Marine strictly prohibits *all* forms of bribery, regardless of the size of the bribe or the identity of the recipient. Tri Marine employees must never offer, promise, or accept bribes or kickbacks, and must not participate in or facilitate corrupt activities of any kind. This prohibition on offering, paying, or receiving bribes also applies to third parties acting on Tri Marine's behalf, such as contractors, vendors, or consultants. Tri Marine employees may not engage a third party to conduct Tri Marine's business if they believe the third party may attempt to offer a bribe.

ii. ***No Facilitation Payments***

Facilitation payments (or "grease payments") are small payments made to low-level government employees as a personal benefit to them to obtain performance of a routine non-discretionary action to which the payer is entitled. Facilitation payments are different than expediting fees — published government rates or fees that are charged by a governmental entity for expediting a service — which are permissible payments. Payment of expediting fees is permissible, but facilitation payments are not.

Many countries consider facilitation payments to be illegal bribes. Accordingly, Tri Marine employees and third parties acting on the Company's behalf may not make any facilitation payment to any government employee in any country. If you have any questions regarding whether a requested payment is a facilitation payment or an expediting fee, refer to your manager.

iii. ***Accurate Record Keeping***

The FCPA requires Tri Marine to maintain books, records, and accounts that accurately and fairly reflect the company's transactions in reasonable detail. The law also requires that Tri Marine maintain a system of internal accounting controls. These provisions are intended to prevent fraudulent or deceptive accounting practices that may conceal bribes.

Even seemingly small errors or omissions can violate the books and records provisions of the FCPA and lead to civil and criminal liability. The error or omission does not need to be related to bribery. A few examples include:

- Mis-characterizing payments by recording an improper payment as a "commission" or "bonus";
- Failing to record a transaction;
- Approving payment of false or fraudulent invoices submitted by a third party;
- Miscoding an improper payment in the general ledger; and
- Falsifying expense reports.

All of Tri Marine's transactions must be fairly and accurately recorded. This requirement applies not only to the company's reported financial statements and general ledger, but also to other records kept in the ordinary course of business, such as purchase orders, invoices, expense reports, and receipts used to support requests for reimbursements.

iv. ***Gifts, Entertainment and Travel***

Providing gifts, entertainment, and travel may be considered a business courtesy and is common in everyday business transactions in many countries. That said the anti-corruption laws governing the conduct of all Tri Marine employees and third parties transacting business on the Company's behalf strictly prohibit offering, promising, authorizing, or giving anything of value to obtain an improper advantage or improperly influence the actions of another.

v. ***Government Officials***

Payments to government officials, political parties, and candidates for political office receive particular law enforcement scrutiny. Moreover, the term "government official" has been interpreted broadly by enforcement agencies and include employees of state-owned or controlled entities. Tri Marine employees and third parties acting on the Company's behalf should never offer *anything* of value to government or political party officials unless approved by corporate management and appropriate legal advice.

vi. ***Non-Government Officials***

Gifts, entertainment, and travel to persons other than government officials must not violate local laws or regulations and should be reasonable and appropriate to the recipient's position, location, and circumstances so that an appearance of impropriety is not created or perceived by the recipient or others as being a bribe

vii. ***Receipt of gifts***

Tri Marine employees may not accept improper gifts or kickbacks from business contacts including vendors and suppliers.

viii. ***Charitable Donations and Political Contributions***

Charitable donations are a vital component of Tri Marine's commitment to the communities in which it operates. Requests for charitable donations must be examined to ensure they do not provide a personal benefit to the recipient. All charitable donations, whether cash or product, must be approved by the manager in charge of the legal entity making the donation, e.g., President, Managing Director or General Manager.

U.S. and foreign laws may limit or prohibit companies from making contributions to candidates for political office, political parties and party officials in the U.S. and elsewhere. In addition, company contributions to candidates, political parties, and party officials may violate foreign anti-corruption laws if they are made to obtain or retain business or advance a business purpose. No political contributions should ever be made on behalf of Tri Marine unless in compliance with applicable laws and after approval by the manager in charge of the legal entity making the donation and concurrence by a senior executive of the Group.



ix. ***Working with Third Parties***

Tri Marine and its employees can be liable for corrupt payments made by third parties who perform services on the Company's behalf (including sales-partners, contractors, brokers, consultants, suppliers, vendors, or agents) even if Tri Marine or the employee did not direct or have knowledge of the corrupt payment. Tri Marine deals only with third parties who apply the same business ethics and standards in conducting business as the Company. In addition, third parties must:

- Comply with Tri Marine's Code of Conduct and all Anti-corruption provisions contained in any contractual agreement;
- Comply with requests to provide information related to anti-corruption due diligence and/or to sign a written agreement that includes anti-corruption provisions;
- Provide legitimate services that are described in reasonable detail in the relevant contract and/or invoice, and;
- Charge reasonable fees that rationally reflect the value of the services provided.

x. ***Third Party "Red Flags"***

Individually, the red flags discussed below do not prove the existence of illicit or improper activity. But, they may suggest the need for further inquiry, consultation with legal counsel, or greater vigilance in managing, reviewing, and monitoring third parties. Such red flags include:

- Doing business in countries where bribes are a common business practice;
- Requests for payments to third parties that are not in any way involved in the business transaction;
- Requests for payments in cash;
- Disproportionately large invoices or payments for the goods received;
- Refusal to provide anti-corruption representations and warranties in an agreement;
- Lack of documentation of work to be performed or services to be provided by the third party, such as the lack of a written contract or invoices that state only "for services rendered";
- Payments requested to be made outside of the usual process or accounting structure;
- Incorrect or incomplete information relative to a payment request;
- The contracting party does not have offices or a staff;
- The contracting party does not have the appropriate level of subject-matter expertise and experience.
- Disproportionately high fees or commissions;
- Inaccurate or inflated invoices;
- Unusual bonuses, advance payments, or special payments are requested;
- Agents or consultants that are strongly recommended by a government official; and
- Agents or consultants who are former government officials dealing with their former agencies.

xi. ***Questions and Reporting***

Violations of U.S. and foreign anti-bribery laws are serious matters that may result in significant criminal and/or civil penalties for Tri Marine, as well as for those individuals involved. Such misconduct can also result in disciplinary action. Good- faith reporting is both encouraged and expected. Failure to report known or suspected misconduct may be interpreted as condoning or participation in the activity.

You are responsible for taking all appropriate action to stop any known misconduct by fellow Tri Marine employees or third parties acting on Tri Marine's behalf. To this end, you must report any known or suspected actions that you believe violate this Global Anti-Corruption Policy or Tri Marine's Code of Conduct. If you suspect corrupt activity, you should report it immediately by contacting Tri Marine Group Senior Management.

If you suspect retaliation for reporting a suspected violation of Tri Marine's Global Anti- Corruption Policy or Tri Marine's Code of Conduct, you should report it immediately by contacting your manager or Corporate Human Resources. Tri Marine will not retaliate or allow retaliation for reports of misconduct.

**3.3 GENERAL STANDARDS OF CONDUCT**

This Code of Conduct is a cornerstone for the manner in which Tri Marine personnel operate. However, this code is not all inclusive of policies and procedures that exist on how we conduct business for Tri Marine Group. Specific policy and procedure are developed to provide more refined guidance and standardization of the application of the core values incorporated in this Code. These general standards exist to guide the further development of specific policy and procedure that is to be developed by the individual entities that make up the group.

**a) Conflicts of Interest**

Conflicts of interest are situations that might compromise the loyalties of a Tri Marine employee, officer or a business partner; pitting Tri Marine interests against other interests, threaten job performance, company reputation, profitability and legal compliance. Tri Marine employees are expected to avoid conflicts of interest and the appearance of conflicts.

**b) Confidentiality**

**Confidential information:** shall mean any data or information that is proprietary to Tri Marine and not generally known to the public, whether in tangible or intangible form. Disclosure of such information could be damaging to the company.

**Personally, identifiable information (PII) or sensitive personal information (SPI):** is information that can be used on its own or with other information to identify, contact or locate a single person, or to identify an individual in context.

**Protected health information (PHI):** is information about health status, provision of health care, or payment for health care that is covered by an entity.

Protecting confidential information and the privacy of our employees is vital to Tri Marine's success and it is the policy of the company to limit the distribution of confidential information about the Company and its employees, officers, customers, suppliers, business partners and vendors. Even within the Company, only disclose confidential information to those who have a need and the authority to know. When in doubt, keep information confidential and discuss the situation with your supervisor. The handling of PII and SPI is often governed by government regulations, always treat this information with the utmost sensitivity as if it were your own information. Contact your human resources representative if in doubt of the procedures for handling personal information.

**c) Quality and Food Safety**

Tri Marine is committed to protecting the health and safety of our customers by providing the highest quality products produced using the safest and sanitary methods available. Tri Marine is firmly committed to the vitality and well-being of consumers worldwide by promoting the most wholesome product possible. Tri Marine is committed 100% to complying with all applicable laws and regulations regarding food safety.

**d) Company Representation**

As an employee of Tri Marine, we must be cognizant of representing the company and brand in what we do and how we present ourselves. We have a responsibility to represent each other in a manner consistent with our core values. In the event of the need by the company to interact with the public or media the Chief Operating Officer, unless otherwise directed, is responsible for directing all company-based interactions with the media, including: issuing all official company press releases, responding to or coordinating the response to inquiries from reporters, scheduling news conferences, and coordinating the communications response to a crisis.

i. *Third Party "Red Flags"*

Do not reference Tri Marine or any entity of the Tri Marine Group on social media without permission of group management. Company information of any kind should not be shared on social media, this includes photos and videos taken on company property. This does not include the use of company reference associated with job titles regarding professional networking or professional society media.

**3.3 GLOBAL ENVIRONMENTAL POLICY**

Tri Marine encourages the use of environmentally sound and sustainable methods in the catch, processing, transportation and storage of fish and fish products by developing, utilizing and sharing appropriate policies, technologies and practices.

Our business activities are designed to minimize environmental damage, protect and promote the wellbeing of workers, and comply with all laws and regulations.

To achieve our environmental objectives, Tri Marine:

- Pursues full compliance with local and international laws and regulations, and the conservation measures of the International Seafood Sustainability Foundation (ISSF).
- Supplies and promotes fish and fish products that come from abundant, well managed fisheries that have minimal ecosystem impacts including those that are Marine Stewardship Council (MSC) certified.
- Improves the scientific understanding of source fisheries through timely, accurate data collection and submission, and investment in collaborative research.
- Engages with policy makers to promote better fisheries management.
- Provides incentives to suppliers to institute by-catch mitigation measures.
- Supports fisheries improvement projects (FIPs) that bring troubled fisheries to a level consistent with internationally recognized sustainability standards.
- Provides for accountability by making this policy public, reporting on progress, and
- providing accurate product attribute and traceability information to customers.

### **3.4 OUR RESPONSIBILITIES**

All Tri Marine employees are responsible for understanding and complying with this Code of Conduct, applicable laws, regulations and Tri Marine policies that are related to their positions. In fulfilling these responsibilities each employee must:

- Read, understand, and comply with the Code of Conduct and all Tri Marine policies that are related to their position.
- Participate in training and educational programs/events as required for their position.
- Obtain guidance for resolving a business practice or compliance concern if they are uncertain about how to proceed in a situation.
- Report possible violations of the Code of Conduct, policies, applicable laws and regulatory requirements.
- Cooperate fully in any investigation.
- Commit to conduct Tri Marine business with integrity and in compliance with laws and regulatory requirements.

If you have any questions about applying this Code of Conduct in your workplace, contact the corporate human resource department.

#### **4. CONTACTS**

**Tri Marine Management Company**

(011) 1-425-688-1288

**Tri Marine Group Human Resources**

(011) 1-425-623-1179

[Humanresources@Trimarinegroup.com](mailto:Humanresources@Trimarinegroup.com)

**Sustainability and Environmental**

(011) 1-425-289-3983

**GM, Tri Marine Fishing Management**

(011) 1-425-623-1234

**Fishing Operations Compliance**

(011) 1-425-623-1226

[Safety@Trimarinegroup.com](mailto:Safety@Trimarinegroup.com)

**Compliance and Reports of Misconduct**

[Hotline@Trimarinegroup.com](mailto:Hotline@Trimarinegroup.com)

**Please complete, sign and date attached “Acknowledgement Receipt of Code of Conduct**

Attachments: [ACKNOWLEDGMENT OF CODE OF CONDUCT Core Values and Standards.pdf](#)

