

Associated Seafoods Ltd (ASL) is committed to the wellbeing of its workers and to the responsible sourcing of goods and services; we therefore expect the same commitment from those who provide us with goods and services.

Purpose and Scope

This Code sets out our company standards which also represent the minimum standards we expect from suppliers whilst encouraging all to exceed minimum requirements; we additionally expect that they in turn apply similar levels of compliance to their own suppliers. “Supplier” for the purpose of this code applies to suppliers, vendors, contractors, consultants, agents and other providers of goods and services who do or seek to do business with us. We expect suppliers to treat all employees fairly, honestly and with respect, in full compliance with Associated Seafoods’ standards. In setting high standards for the way we conduct business, we expect suppliers to conduct business responsibly, with integrity and **transparency**.

The requirement for transparency is non-negotiable in every aspect of our operation and to us means free access to open, honest, and fully compliant information as required from any part of our supply chain, whether that be in respect of people, product, or process. The requirement is not a standalone policy but the principle is intrinsic in all business policies and dealings.

As a fundamental matter of principle, we will refuse to trade with companies that are not mindful of their ethical, social, environmental, financial, and humanitarian responsibilities. We adopt a precautionary approach wherever we cannot adequately confirm such standards are being applied by our suppliers.

These principles will form part of the supplier selection process and are subject to ongoing monitoring and review.

Human Rights

Associated Seafoods Ltd is committed to ensuring the highest standards within the supply chain, including clients, workers, contractors, and suppliers and to continuously work to further improve. We will only work with reputable suppliers and manufacturers who are committed to, and fully compliant with the conditions set out in this code. A process of self-evaluation, independent audit and training is in place to ensure that continuous improvement is made.

1. Employment is freely chosen

- There is no forced, bonded, or involuntary prison labour
- Workers are not required to lodge "deposits" or their identity papers and are free to leave in accordance with the terms set out in their contract.
- We will work in partnership with our suppliers to prevent and eliminate any practice that may be deemed Modern Slavery within our supply chains.
- Where any breach is identified, the issue will be reported to the GLAA (Gang Master and Labour Abuse Authority) or Police in the UK and with the appropriate authorities within our supply chains including internationally if relevant.

Modern Slavery Policy Link: https://www.associatedseafoods.com/download_file/232/378

2. Freedom of Association and The Right to Collective Bargaining are Respected

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

- Workers' representatives are not discriminated against and have access to carry out their representative functions in the workplace.
- Where the right to freedom of association and collective bargaining is restricted under law, we will facilitate, and not hinder, the development of parallel means for independent and free association and bargaining.

3. Working Conditions Are Safe and Hygienic

- A safe and hygienic working environment will be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards.
- There is an absolute requirement on all suppliers (including vessels) to have and share a policy/standard describing their working conditions which should be in accordance with the requirements set out in ILO C188.
- Adequate steps will be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimising, so far as is reasonably practicable, the causes of hazards inherent in the working environment.
- Workers will receive regular and recorded health and safety training, and such training will be repeated for new or reassigned workers.
- Access to clean toilet facilities and to potable water, and, if appropriate, sanitary facilities for food storage will be provided.
- A senior manager will be responsible for health and safety.

4. Child Labour

- There will be no new recruitment of child labour.
- Where child labour is found, the company will participate in and contribute to policies and programmes which provide for the transition of any child found to be performing child labour to enable her or him to attend and remain in quality education until no longer a child; (*"child" and "child labour" being defined below*).
- Children and young persons under 18 will not be employed at night or in hazardous conditions.
- Our policy and procedures relating to the employment of children will conform to the provisions of the relevant ILO standards. (*Young Workers and Modern Slavery policies*).

Modern Slavery Policy link: https://www.associatedseafoods.com/download_file/232/378

Young Workers Policy

5. Living Wages Are Paid

- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards.
- All workers are provided with written and understandable information about their employment conditions in respect of wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid.
- Deductions from wages as a disciplinary measure will not be permitted nor will any deductions from wages not provided for by national law be permitted without the express written permission of the worker concerned.

6. Working Hours Are Not Excessive

- Working hours comply with national laws and benchmark industry standards, which ever affords greater protection.

- In any event, workers will not, on a regular basis, be required to work in excess of 48 hours per week and will have at least one day off for every 7-day period on average. Overtime is voluntary and additional payment will be made.

7. No Discrimination is Practised

- There is no discrimination in hiring, compensation, access to training, promotion, termination, or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

8. Regular Employment

- To every extent possible work performed must be on the basis of recognised employment relationship established through national law and practice.
- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship will not be avoided through the use of labour-only contracting, sub-contracting, or home-working arrangements, or through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor will any such obligations be avoided through the excessive use of fixed-term contracts of employment.

9. No Harsh or Inhumane Treatment is allowed

- Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation is prohibited.

Definitions:

- Child - Any person less than 15 years of age unless local minimum age law stipulates a higher age for work or mandatory schooling, in which case the higher age will apply. Young person - Any worker over the age of a child as defined above and under the age of 18.
- Child Labour: Any work by a child or young person younger than the ages specified in the above definitions which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the child's or young person's education, or to be harmful to the child's or young person's health or physical, mental, spiritual, moral, or social development.

Ethical Standards Policy Link: https://www.associatedseafoods.com/download_file/223/378:

Environmental Impact

ASL conducts its business in a manner that embraces sustainability and reduces environmental impact. Operations, sourcing, manufacture, distribution of products and the supply of services are conducted with the aim of protecting and preserving the environment and to comply with environmental legislation and regulations. We will continue to work to further reduce the environmental impact of our business activities. In addition to complying with local laws, steps will be taken to optimise the use of energy and natural resources and reduce the generation of waste.

- Suppliers will carry out operations with care for the environment and at a minimum will comply with all applicable environmental laws and regulations.
- Suppliers are expected to support ASL sustainability commitments through the adoption of good operating practices. In particular, suppliers should seek to optimise their use of natural resources and minimise the generation of waste.

- Suppliers will endeavour to secure their raw materials from fully traceable, sustainable sources and where required, will be members of relevant multi-stakeholder initiatives or reporting platforms that support responsible sourcing.
- Suppliers will also comply with any additional category specific requirements regarding the goods or services provided to ASL.

Business Ethics

In keeping with our commitment to appropriate standards of professionalism and ethical conduct in all business activities, Associated Seafoods Ltd has zero tolerance to bribery or corruption in any form (*Anti-Bribery Policy*).

- Suppliers and business partners are not permitted to directly or indirectly promise, offer, or provide any improper advantage to any person or entity, including officials of a government or a government-controlled entity.
- Employees must not accept any such advantage and we expect the same approach in business dealings from our business partners, suppliers and third parties.
- Suppliers are expected to maintain accurate records of their activities and performance that clearly demonstrate compliance with all applicable standards, regulations, and ASL requirements.
- Suppliers must disclose any personal relationships, economic interest or other ties to their business held by an employee or contractor with ASL.
- Suppliers shall provide ASL with high-quality ingredients, products and services that meet all applicable quality and food safety standards and demonstrate that they have robust food-safety and quality-management systems in place. We expect suppliers to immediately report any concerns about product safety.
- Suppliers shall take appropriate measures to secure and protect all confidential information and use it only for the purpose authorised under contractual agreement. This obligation shall remain in force regardless of the status of the business relationship.

Traceability and our Supply Chain

At ASL, we recognise the criticality of traceability throughout the supply chain to protect the integrity and quality of our products. We strive to host a fully traceable supply chain back to point of origin; therefore, we require our suppliers to be actively involved in the retention of all relevant information. All required information will be established during our supplier approval process and mutually agreed between supplier and ASL.

- 1.1 Suppliers must keep accurate and honest records for all information required by ASL.
- 1.2 ASL will regularly assess the integrity of the traceability procedure and verify the ability to trace back to point of origin and where necessary, suppliers will be required to comply with all traceability requests received from ASL, with any request responded to within 48hrs of receiving the communication.
- 1.3 The minimum information required from suppliers will be identified on a case-by-case basis for each supplier during the approval process.
- 1.4 ASL will keep up-to-date supply-chain maps on record for all raw materials.
 - 1.4.1 Supply chain maps are to include transshipments where applicable.

Compliance

Suppliers are expected to co-operate with any authorised third party, to conduct audits to verify compliance with these standards or other required certifications. In the event of shortfall in any area, the supplier will take the steps necessary within a mutually acceptable timeframe to make satisfactory corrections. Suppliers must immediately report any concerns about compliance with

legal requirements or any aspect of this code to their designated point of contact. Where suppliers are found to have breached the requirements set out in this Code, ASL reserves the right to terminate any agreement or business relationship.

As an integral part of our commitment to human rights, we work to ensure that our business, our partners, and associated supply chains adhere to the highest standards of behaviours and care. We aim to proactively identify and tackle all forms of slavery and human trafficking. We ensure a consistent approach within our own operations and our supply chain and have established a “live” set of policies that will enable us to meet our commitments including:

Anti-bribery

Dignity at Work

Equality in the Workplace

Ethical Standards Policy Link: https://www.associatedseafoods.com/download_file/223/378

Harassment and Bullying

Human Rights

Recruitment and Selection

Whistleblowing Policy Link: https://www.associatedseafoods.com/download_file/335/378

Young Workers Policy