Lusamerica Foods Inc. Sustainability Policy & Supplier Code of Conduct

Updated 2/5/2025

At Lusamerica Foods, Inc., we recognize the importance of sustainable practices in the seafood industry to protect and preserve marine ecosystems for future generations and the workforce within these systems. We are committed to continuously improving the sourcing of our seafood, both environmentally and socially, to help drive sustainability throughout the seafood industry. This sustainability policy outlines our guiding principles and commitments as well as the expectations we hold by our supplier vendors.

Responsible Sourcing

We will continue to increase the amount of seafood from suppliers who demonstrate a commitment to sustainable fishing and aquaculture practices. To help determine the level of sustainability of a product, we utilize several science-based third-party entities including:

a. The Monterey Bay Aquarium Seafood Watch program
    a. Other ratings programs may be considered who are part of the Global Seafood Ratings Alliance (GSRA)
b. Third-party eco-certifications including:
    a. Marine Stewardship Council (MSC)
    b. Aquaculture Stewardship Council (ASC)
    c. Best Aquaculture Practices (BAP)
    d. Fair Trade USA
    e. Other entities recognized by the Global Sustainable Seafood Initiatives (GSSI)

Traceability

Tracking seafood throughout the supply chain is an integral part of maintaining the accuracy and credibility of data to help inform sustainability levels and ensure food safety protocols. At Lusamerica, we use SAP as our in-house tracking system to trace seafood throughout our warehouses. Sustainability data is associated with each incoming batch and is available upon request. We also utilize Trace Register as a third party system available as a means to transmit data securely. Key data elements tracked on our seafood includes, but is not limited to:

A. Common name
B. Scientific name/Latin Name
C. Country of Origin
D. FAO Fishing Area
E. Fishing or farming method

F. Eco-certification numbers, if applicable
G. Fishery Improvement Project details, if applicable (FIP name and participant)

Tuna Vessel Data Requests

We require all vessels in our tuna supply chain to be listed on their respective RFMO's (regional fisheries management organization's) authorized vessel list. Tuna suppliers are also asked to track the following vessel-level data:

- Vessel name
- Vessel flag
- Gear type
- Unique vessel identification number (may be the International Maritime Organization or the Maritime Mobile Service Identity)
- FAO fishing area
- Fleet owner name
- Owner nationality
- Captain nationality
- Crew nationality

If a vendor or supplier is having trouble tracking certain data, we encourage them to communicate those challenges to Lusamerica so they can be relayed to Lusamerica's various sustainability partners. Solutions or tips might be available, and the feedback helps Lusamerica understand the feasibility of data requests.

Strategic Partnerships & Resources

We actively collaborate with industry partners and non-profit entities to promote sustainable fishing and aquaculture practices. The resources and partners below also keep us informed about scientific research and advancements in sustainable fishing and aquaculture so we can stay on top of the latest issues and solutions.

a. Partnerships:
    a. The Conservation Alliance for Seafood Solutions:
    b. The Coalition for Sustainable Aquaculture
    c. FishChoice
    d. Marine Stewardship Council
    e. Aquaculture Stewardship Council
    f. The Nature Conservancy (Tuna Transparency Pledge)

b. Additional Resources:
    a. FishWise
    b. FisheryProgress
    c. Sustainable Fisheries Partnership

Employee Education and Engagement

We will provide ongoing training and educational resources to our employees to raise awareness about sustainability issues in the seafood industry. We will also foster a culture of environmental responsibility and sustainability within our organization.

Continuous Improvement

1. We will regularly review and assess the effectiveness of our sustainability practices and make necessary improvements. To accomplish this, we review and focus on the largest volume products in our portfolio. We also are actively helping our largest customers meet their sustainability goals which naturally improves the sustainability of our seafood on an ongoing bases.

2. We will actively seek feedback from our customers, suppliers, and stakeholders to identify areas for improvement and implement appropriate measures.

3. We will remain open to adopting new technologies and innovative approaches that promote sustainability in the seafood industry.

4. We will utilize the Roadmap for Improving Seafood Ethics (RISE) platform created by FishWise to identify high-risk fisheries and countries where we need to dig into our supply chains for a deeper dive. The RISE platform aims to promote human rights and decent work environments for individuals working in the seafood industry.

5. By adhering to this sustainability policy, we aim to contribute to the long-term health and vitality of marine ecosystems, promote responsible fishing and aquaculture practices, and ensure the availability of seafood for future generations while protecting the individuals working in the seafood sector.

Supplier Code of Conduct

Harassment & Abuse

Suppliers must treat each worker with dignity and respect. Workers must not be subject to physical, sexual, psychological or verbal harassment, or abuse. Suppliers must not use monetary fines, compulsory labor, or reductions in benefits as a disciplinary practice. Workers must also be free to voice concerns to directly to their employer or appointed third party, without fear of retaliation by management.

Recruitment

Lusamerica expects costs associated with worker recruitment to be borne by the employer and not by the worker. Workers should be hired directly whenever possible. When the subcontracting of recruitment and hiring is necessary, labor agencies engaged, must operate legally, be certified or licensed by an applicable authority in country, must not charge recruitment fees, use only trained

employees, and must not engage in fraudulent recruitment practices that place workers at risk for human trafficking and sexual exploitation.

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

Nondiscrimination

Suppliers must not discriminate in employment practices. This includes recruitment, hiring, remuneration, and the promotion of qualified people of all backgrounds, regardless of sex, ethnicity or national origin, race, religion, age, marital status, pregnancy, physical or mental disability, political opinion, personal characteristics and beliefs, sexual orientation, gender identity or any basis protected by applicable laws. Suppliers must ensure migrant workers are treated no less favorably than country nationals in all aspects of employment (including but not limited to wages, benefits, trainings, eligibility for promotions, and accommodations)

Grievance Procedures

Suppliers must have established, effective grievance mechanisms and procedures to ensure that any worker, including migrant workers, acting individually or with other workers, can submit a grievance without suffering prejudice or retaliation of any kind. Workers must also be able submit grievances anonymously. Grievance mechanisms and procedures must be available to each worker in a language that the worker understands. Suppliers must have a process in place to remediate issues if found and provide regular communication with complainants to inform them of the status of their grievance.

Health & Safety

Suppliers must provide safe, hygienic, and healthy working and living conditions for all workers in accordance with applicable laws and prevailing industry standards. This includes standards related to vessel safety, building structure, electrical safety, fire safety, chemical safety, sanitation, noise, lighting, ventilation, emergency preparedness, first aid, personal protective equipment, clean drinking water, food preparation hygiene, and other safety policies. Employers must conduct regular workplace health and safety risk checks to identify possible hazards and corresponding controls. Vessel captains must maintain an accurate crew register that includes accurate contact information, position held, relevant identity document number, the birthdate of each crew members (to ensure compliance with child labor regulations), and emergency contact information.

Legal Requirements

Lusamerica expects its suppliers to comply with all applicable laws and regulations of the Canada and those of the respective country of operations, processing or exportation. All products must be accurately labeled and clearly identified as to their country of origin and content.

Child Labor

Suppliers will not employ anyone under the minimum age as established by applicable law in country, or under the age of completing compulsory education, whichever is older. Suppliers must not employ

anyone under the age of 18 in hazardous, unsafe, or unhealthy working conditions. Suppliers must also have established procedures for age verification as part of their hiring process.

Forced Labor

Lusamerica will not conduct business with any supplier that uses involuntary labor of any kind, including prison labor, indentured labor, bonded labor (including debt bondage), or labor obtained through trafficking, coercion, or slavery. All work must be voluntary and workers must have the freedom to terminate their employment at any-time without penalty. Workers at sea have the right to disembark and terminate employment at the next regularly scheduled port visit. Port visits must occur at least once a year or more frequently.

Employment Contracts

Suppliers must provide written employment contracts to workers in a language understood by workers (with additional provisions made for illiterate workers or workers with difficulties understanding written contracts). Contracts must clearly indicate workers' rights, responsibilities, and conditions of employment, and include information regarding wages and benefits, working hours, working conditions (including work-related hazards), living conditions and associated costs, and locations of work. Employment contracts must be signed by all responsible parties, including, but not limited to, employers, contractors and sub-contractors, recruitment agencies, and workers. Workers must be given a copy of their signed employment contract, with migrant workers receiving a copy of their signed employment contract at least five days prior to deployment. The use of supplemental agreements, amendments, or the substitution of original contracts with terms that are less favorable to workers is strictly prohibited.

The notice period for workers to terminate contracts must not exceed the requirements of applicable law, or one month where no there is no legal requirement. Workers must not receive penalties for the termination of their employment contract upon giving the required notice.

Freedom of Movement & Personal Freedom

Workers must have unrestricted access to basic necessities such as clean drinking water during work hours. Workers' freedom of movement must not be unreasonably restricted. Workers must not be physically confined to the workplace or in premises such as, but not limited to, employer- or recruiter-operated residences; nor will any other coercive means be used to restrict workers' freedom of movement or personal freedom. Mandatory residence in employer-provided or -arranged facilities must not be made a condition of employment, unless required by law. Vessel-based workers have a right to repatriation if their employment agreement expires or is terminated. Any costs associated with repatriation is the responsibility of the vessel or facility owner, unless stipulated by applicable law.

Documentation

All workers, including migrant workers, must retain full and complete control over the original copies of all 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. 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.

Supporting ILO 188

ILO 188 is an international labor standard adopted by the International Labour Organization (ILO) to ensure decent working conditions for fishers worldwide. The convention addresses a wide range of issues related to the fishing industry, with the aim of improving safety, health, and labor rights for fishers. It addresses the unique challenges and risks faced by fishers, promoting fair treatment and improving overall conditions in the fishing sector. By ratifying and implementing the convention, countries commit to upholding these standards and protecting the rights of fishers within their jurisdictions.

As of June 2024, the countries that have ratified ILO Convention 188 include: Angola, Congo, Namibia, South Africa, Thailand (first in Asia), Estonia, France, Lithuania, Norway, Bosnia and Herzegovina, United Kingdom, Argentina, Morocco, and Senegal.

We request vendors implement standards that align with ILO 188 and request support in encouraging countries not yet listed to consider ratifying ILO 188.

Supporting the Cape Town Agreement

The Cape Town Agreement (CTA) of 2012 is an international treaty adopted by the International Maritime Organization (IMO) to enhance the safety of fishing vessels and their crews. It sets standards for the design, construction, equipment, and inspection of fishing vessels of 24 meters in length and over, operating on the high seas. The agreement addresses issues like stability, seaworthiness, machinery, electrical installations, fire safety, lifesaving appliances, and emergency procedures. The Cape Town Agreement is crucial for the protection of fishers, who often work in one of the most dangerous professions. By setting international standards, the CTA seeks to reduce the high rates of fatalities and injuries in the fishing industry and improve overall working conditions. We request vendors implement standards that align with CTA and request support in encouraging countries not yet listed to consider ratifying CTA.