

Code of Conduct **Supplier**

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Introduction

PP Groep Katwijk B.V. and all other national or foreign subsidiaries over which PP Groep Katwijk B.V. can exert its control, hereafter jointly referred to as “PP Group”, is one of the world’s largest seafood companies. As a family-owned concern with over 10.000 employees, we are dedicated to provide millions of people worldwide with affordable, healthy food every day. We do this in a sustainable manner, having taken corporate social responsibility very seriously for many years, preserving the capital in the sea by catching the interest only.

We optimize our efforts to conserve, sustainably use and protect the ocean resources at all levels within our scope of activities and, while doing so, increase transparency throughout our supply chains. A sustainable business for us means to manage and contribute to the health of our oceans, while contributing to an environmentally sustainable planet by minimizing the negative effects of our activities on the environment and climate. In addition to this, we want to enable all stakeholders inside and outside our organization to optimize their working and living standards and invest in their wellbeing and development. We can only do this together with our partners and suppliers. That’s why we highly value and focus on sustainable procurement and sourcing.

This Supplier Code of Conduct is part of our sustainable sourcing efforts and sets out the standards and principles we comply with and we expect our global suppliers to comply with as well. We believe together we can work on realising a transparent, safe and sustainable supply chain.

PP Group and sustainable sourcing

Sustainable procurement means that we take sustainability into account with purchasing decisions, alongside the conventional procurement criteria of price and quality. It helps us to engage in an open dialogue with our suppliers, with other stakeholders and with the general public. It is an important instrument to emphasize why healthy fish stocks are so important.

Our aim is to lower our environmental impact and ensure regard for social issues, such as employment conditions, via our procurement system. When selecting suppliers and assessing new and existing supply relationships, PP Group considers economic criteria, environmental and resource protection, compliance with human rights, labor and social standards as well as anti-discrimination and anti-corruption requirements. We want to work in partnership with our suppliers to achieve our ambitions and continually improve our performance over time.

Scope of this Code

It is our responsibility to ensure that our suppliers understand what is expected of them. The PP Group Supplier Code of Conduct helps our suppliers around the world to understand our minimum standards. We expect our suppliers to acquaint themselves with the content of this Supplier Code of Conduct and to adhere to all applicable laws and regulations where they operate, as well as the minimum standards set out in this Code of Conduct.

Our wide range of suppliers are our indispensable partners, that help us carry out our core business and tasks. We expect our suppliers to incorporate and be compliant with the described standards in this Code of Conduct, that are within their sphere of influence and measured by their best possible effort and influence on the issue or standard. This then applies for all production facilities, sub-suppliers, subcontractors and other third parties. Also, we expect them to involve all individuals with these standards, that are employed by them. So that it's clear for all of them what these minimum standards contain, and how they can contribute to compliance.

At last and in addition to this Code, PP Group has an Anti-Money Laundering Policy. This additional KYC procedure (Know Your Customer) supports in our customer identification process, and ensuring business ethics on a right level. See P.8 for more information.

Code of Conduct standards and framework



This Supplier Code of Conduct was drawn up in accordance with the UN Global Compact Guiding Principles (divided over the four categories of Human Rights, Labour, Environment and Anti-Corruption); the OECD guidelines for responsible business conduct; and the core ILO Conventions. These are the minimum standards we follow and that we expect our suppliers to follow.



As an EU based company we comply with the EU regulatory framework and adhere to the AIPCE-CEP Principles for Environmentally Responsible Fish Sourcing. This includes the commitment to support the international movement to stop all trade in illegally caught seafood. We actively work on IUU Regulation and want our suppliers to comply with the same demands by the EU. Traceability is a key control mechanism in combating illegal fishing.

When operating in the convention areas of RFMOs PP Group complies with the IUU measures adopted by these RFMOs. All our fishing activities outside EU-waters must be specifically authorized by the Flag Member State. We expect our global suppliers to comply with this regulatory framework in the same way.



We draw upon the FAO Code of Conduct for Responsible Fisheries and are compliant with the responsible business conduct as set out in this code. The FAO Code of Conduct helps improve the legal and institutional framework for responsible fisheries and implement effective measures.



PP Group's own values and principles are also leading in both our own efforts and the efforts we expect from our global suppliers, to ensure a responsible supply chain and business conduct. We share the same values with the people that are part of PP Group: passionate, trustworthy and dedicated.

Our CSR strategy and sustainability focus areas

PP Group strives to be a recognized worldwide supplier of top quality, nutritious and sustainable seafood products. We optimize our efforts to conserve, sustainably use and protect the ocean's resources at all levels within our scope of activities. While doing so, we increase transparency throughout our supply chains. Our activities are structured under the 3 pillars in our CSR strategy.

<p>HEALTHY OCEANS: <i>Sustainable resource management</i></p>	<p>Optimize our efforts to conserve, sustainably use and protect the ocean resources at all levels within our scope of activities and increase transparency throughout our supply chains.</p>	<p>FOCUS AREAS:</p> <ul style="list-style-type: none"> • Sustainable fishery • Innovation and research • Traceability • Sustainable procurement
<p>HAPPY PLANET: <i>Durable supply chain optimization</i></p>	<p>Contributing to an environmentally sustainable planet, by minimizing the negative effects of our activities on the environment and climate.</p>	<p>FOCUS AREAS:</p> <ul style="list-style-type: none"> • Energy efficiency from catch to plate • Carbon measurement • Waste water treatment • Sustainable packaging and plastic reduction
<p>HAPPY PEOPLE: <i>Product innovation to enhance human wellbeing</i></p>	<p>Enabling all stakeholders inside and outside our organization to optimize their working and living standards and invest in their wellbeing and development.</p>	<p>FOCUS AREAS:</p> <ul style="list-style-type: none"> • Food safety and security • Product innovation and circular business • Sustainable product innovation • Fair wages

Our suppliers play a crucial role in helping us deliver on our responsibility and ambition. We want to develop a supportive relationship around mutual responsibilities, in which standards across the value chain are raised.

Suppliers are encouraged to contact the CSR Department of PP Group in case of any questions about the contents of the Supplier Code of Conduct or if they require further guidance or support to ensure compliance via csr@pp-group.eu.

Supplier Code of Conduct

As one of the world's largest seafood companies, PP Group strives to balance ecological, social and economic interests. We are continuously looking for improvements that enable us to do this. We strive to ensure that all fisheries in which our vessels operate are certified in accordance with sustainability standards. We want to operate in accordance with the highest ethical, social and ecological business standards. As a group representing companies globally, PP Group wants to assure that all products that derive from our companies and/or brands are made in good conditions, respecting the environment and the well-being of all workers involved in the supply chain. We want to do this by minimizing negative social and environmental impacts and by maximizing the positive ones. By treating all employees fairly and with respect, and by taking into account environmental laws, international trade regulations and labour law safety provisions.

PP Group supports and strives to continuously improve good corporate governance that contributes to social responsibility and broader sustainable development goals as expected by the international community. To achieve this, PP Group complies at a minimum with the applicable legal framework of the countries of operation. Our commitment to stimulate sustainable and responsible business conduct in the fishery sector takes into account internationally recognised human rights and environmental standards. We expect the same from our global suppliers.

Business Ethics and Integrity

A guiding principle in all actions and decision-making processes within PP Group is promoting integer behaviour. This spans from not tolerating corruption or discrimination to actively supporting the fight against money-laundering.

Anti-Bribery and Corruption

PP Group expects its suppliers to not tolerate corruption and to ensure compliance with the United Nations (UN) and the Organization for Economic Co-operation and Development (OECD) Conventions on Combating Corruption and the relevant anti-corruption laws in their companies. In particular, they ensure that their employees, subcontractors or agents do not offer, promise or grant any benefits to PP Group employees or related parties with the aim of obtaining an assignment or other preference in the course of business dealings. All suppliers are required not to be involved in any act of corruption, extortion or embezzlement or any form of bribery.

Read our [Anti-Bribery and Corruption policy](#).

Anti-Money Laundering

PP Group expects its suppliers to comply with the relevant legal obligations for money laundering prevention and not to participate in money laundering activities. Money laundering means exchanging money or assets that were obtained criminally for money or other assets that are 'clean'. The clean money or assets do not have an obvious link with any criminal activity. The purpose of money laundering is

to conceal the origin of the money. Suppliers and their employees are strictly forbidden from participating in or facilitating a money laundering transaction. They shall only conduct legitimate business activities and shall not accept or handle cash or other assets that they have reason to suspect are the proceeds of a crime.

Read our [Anti-Money Laundering policy](#).

In order to guarantee the above as much as possible, PP Group has a Third Party Risk procedure in place in addition to this Code of Conduct for suppliers. This procedure provides our directors and employees with guidance to minimize risks regarding money laundering, bribery and corruption and take the appropriate steps if risks are identified with new and existing customers and suppliers. It's also known as a KYC (Know Your Customer) policy and procedure. It supports in our customer identification process, and ensuring business ethics on a right level.

Competition

PP Group highly respects the rules of free and fair competition in all business relationships. PP Group expects from its suppliers similar behaviour, and that they do not act against any competition and/or anti-trust law.

Human Rights and Labour Standards

Compliance with human rights is consistent with PP Group's core values, the UN Guiding Principles on Business and Human Rights (UNGPs), the OECD guidelines for responsible business conduct and the Core ILO Conventions (No 29, No. 87, No. 98, No. 100, No. 105, No. 111, No. 138 and No. 182), while taking into account the laws and legal forms applicable in various countries and locations. In addition to these core Conventions our Supplier Code of Conduct takes into account some very specific Conventions that are relevant for our business. In the overview below we have listed these conventions. PP Group supports and respects all human rights and relevant principles related to human rights as a minimum standard.

- ILO Forced Labour Convention, 1930 (No. 29)
- ILO Freedom of Association and the Right to Organize Convention, 1948 (No. 87)
- ILO Right to Organize and Collective Bargaining Convention, 1949 (No. 98)
- ILO Equal Remuneration Convention, 1951 (No. 100)
- ILO Abolition of Forced Labour Convention, 1957 (No. 105)
- ILO Discrimination (Employment and Occupation) Convention, 1958 (No. 111)
- ILO Minimum Age Convention, 1973 (No. 138)
- ILO Worst Forms of Child Labour Convention, 1999 (No. 182)
- ILO Work in Fishing Convention, 2007

(No. 188)

- ILO Maritime Labour Convention, 2006 (MLC, 2006)
- United Nations Convention on the Rights of the Child (UNCRC)

Non-discrimination

PP Group expects its suppliers to promote equal opportunities and equal treatment of all employees: all direct employees, as well as indirect workers including contractors and freelancers. Suppliers are expected to prevent discrimination in the recruitment of workers and in the promotion or granting of primary and continuing professional training programmes and other forms of compensation, promotion, rewards, termination or retirement. No employee may be discriminated against on grounds of caste, national origin, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation, health, disability or pregnancy.

Mutual Respect and Fair Treatment

All workers shall be treated with respect and dignity. Suppliers shall base all terms and conditions of employment on an individual's ability to do the job, and not on the basis of personal characteristics or beliefs such as described above. Suppliers shall not engage in or tolerate bullying, harassment or abuse of any kind. Suppliers shall ensure that workers are not subjected to inhumane or degrading treatment, corporal punishment, sexual harassment, mental or physical coercion and/or verbal abuse.

Diversity, Equality and Inclusiveness

The variety of employees represents one of the greatest assets of companies. It contributes to continued success. PP Group expects its suppliers to value the unique abilities, strengths and skills of each employee and to support one another while embracing and respecting cultural diversity and local traditions. Supplier shall treat all people equally and fairly, based on the principle of non-discrimination and respect cultural and individual diversity and promotes inclusiveness. Discrimination based on caste, national origin, ethnicity, religion, age, disability, gender, marital status, sexual orientation, union membership, political affiliation, health, disability or pregnancy is prevented.

Fair Remuneration

All workers involved in the supply chain of PP Group have the right to earn a fair wage. A fair remuneration is sufficient to provide them with a decent living for themselves and their families, as well as social benefits legally granted. A fair wage should be revised annually and negotiated regularly.

PP Group expects of all its suppliers to make a (long term) commitment to ensure a fair remuneration for all employees. The compensation that employees receive must be at all times in accordance with applicable national laws as the absolute minimum.

Freedom of Association and the Right to Collective Bargaining

Supplier shall work on improved workplace

dialogue and industrial relations, where freedom of association is respected, where workers' representatives have a voice and where trade unions can negotiate and bargain collectively are preconditions for lasting improvement for employees in all regions of operation.

All workers have the right to join or form trade or labour unions, to associate and/or engage in collective bargaining, to seek representation and to join workers councils – all without prior authorization from supplier management. Supplier shall not interfere with, obstruct or prevent such legitimate activities.

Working Hours

Working hours shall comply with applicable regional, national (or relevant international) laws and regulations and industry standards, whichever affords greater protection to ensure health, safety and welfare of workers. In any event, workers shall not, on a regular basis, be required to work in excess of the maximum amount hours per week, and shall be provided with sufficient resting periods. Suppliers shall respect the standards that apply.

Forced Labour and Modern Slavery

PP Group expects suppliers to prevent and eradicate forced or bonded labour in the whole supply chain. All work shall be conducted on a voluntary basis, and not under threat of any penalty or sanctions. There shall be no use of forced, including bonded or prison, labour or any engagement in related activities such as

retention of identity documents or trafficked labour, that violates basic human rights. All agreed work activities to be conducted by employees of suppliers, must be laid down in writing in accordance with the relevant legal provisions.

PP Group complies with international or local laws regarding the prohibition of slavery and human trafficking, whichever is stricter. We expect our suppliers to be compliant with the same.

Suppliers shall not use any form of bonded labour nor permit or encourage workers to incur debt through recruitment fees, fines, or other means. Suppliers shall respect the right of workers to terminate their employment after reasonable notice. Suppliers shall respect the right of workers to leave the workplace after their shift. To this end, PP Group prohibits a person's economic and social exploitation by another for personal and/or commercial gain, forced and compulsory/involuntary labour.

Child Labour and Protection of Young Workers

Child Labour is strictly prohibited throughout the whole value chain of PP Group. Our aim is to contribute to eradicate child labour in the supply chain and to ensure that child labour is not displaced or relocated to other sectors or countries.

Suppliers shall not employ children and shall establish robust age verification mechanisms as part of the recruitment process, which may

not be in any way disrespectful or degrading to employees. The age for admission to employment shall not be less than the age of completion of compulsory schooling as defined by the law and in any case not less than 15 years.

PP Group strictly prohibits the use of child labour and adheres to relevant international standards related to children's rights. When differences or conflicts in standards arise, PP Group applies the highest standards. We act in compliance with applicable national laws, regulations and requirements, ensuring the respect of the children's rights to attend and/or complete compulsory schooling.

Community and Stakeholder Engagement

PP Group is operating in a global supply chain and communities with partners from around the world. It is our aim to establish and maintain relationships at all levels with our customers, business partners, local communities and the wide range of other stakeholders, based on shared values, loyalty and mutual trust. With a view to contributing to inclusive positive social and economic impacts in the long term, PP Group is strongly committed to conducting a responsible business that respects the fundamental rights of local communities, including those of indigenous peoples as well as those of other vulnerable and disadvantaged groups. We encourage our suppliers to adhere to these principles and to collaborate with us on investing in, establishing and maintaining fair and ethical relationships with all relevant stakeholders.

Read our www.pp-group.nl and approach on our website

www.pp-group.nl.

Capacity building

PP Group is active on most continents and our operations take place in and around a variety of communities. The economic impact our companies have on these communities is best demonstrated by the job opportunities they create and the effects of these jobs on the local economy and trade. We believe that sustainable development correlates with empowering local communities. Therefore, as part of our community and stakeholder engagement special attention goes to building local capacity of and empowering fishing communities worldwide, to contribute to improving the lives of the people working and living where we operate. We encourage our suppliers to take responsibility for the local communities in which they operate.

Occupational Health and Safety

PP Group has all measures, assessments and policies in place to reduce the risks to workers from hazardous conditions. We aim to provide all employees in our global supply chain with a safe and healthy working environment. In order to meet this goal, PP Group complies with all applicable health and safety laws, including the ILO Maritime Labour Convention 2006 and the ILO Work in Fishing Convention 2007 (No. 188), implements safety procedures, measures and committees and has strict procedures in place.

PP Group expects its suppliers to also comply with applicable national health and safety legislation. It is also expected that suppliers build and apply appropriate occupational safety management. This includes on the one hand the mitigation of actual and potential occupational safety risks and on the other hand the training of employees in order to prevent accidents and occupational diseases in the best possible way.

Read our [OHS policy](#).

Food Safety

Food Safety is a focus area within the corporate social responsibility program of PP Group. Therefore, PP Group expects from its suppliers that they will have in place a food safety system certified by a recognized food safety scheme and national regulations.

Read our [Quality and Food Safety policy](#).

Training & Development

The personal and professional development and long-term employability of our employees are of utmost importance to PP Group. As such we invest in their training and development to support them broaden their skills, build capacity and support their career development. We expect from our suppliers to share this vision and invest in training programs and career development for their employees.

Environment

PP Group aims to contribute to an environmentally sustainable planet, by minimizing the negative effects of our activities on the environment and climate. We do this by focusing on a durable supply chain; reducing our energy use; greenhouse gas emissions; circular and sustainable design principles; and resource efficiency and waste reduction. As minimum standards we strictly comply with applicable national environmental laws, regulations and standards. PP Group expects the same of all its suppliers. Moreover, we select suppliers that are able to show a high level of environmental responsibility as preferred partners.

With regard to the fish resource, we expect our suppliers to guarantee the absolute renunciation of goods from illegal fishing (IUU fishing: illegal, unreported, unregulated) and act in accordance with the EU IUU Legal Framework, the AIPCE-CEP Principles for Environmentally Responsible Fish Sourcing and other relevant frameworks. This includes minimizing waste and discarding at sea, improving fisheries to reach then maintain an ecologically and economically sustainable fish stock size and committing to work on issues such as carbon footprint, energy and water usage as well as waste reduction. In addition, we encourage our suppliers to certify against a sustainability standard.

Animal Welfare

PP Group closely monitors the scientific and social debate on animal welfare by, among others, the Sustainability Committee of the Dutch Fish Federation and the European

Aquaculture Advisory Council (AAC), and enter into constructive dialogue with stakeholders on the matter. When it comes to the matter of using antibiotics we comply with applicable national laws, regulations and standards. We require our suppliers to do the same and adhere to best practices and standards regarding animal welfare.

Read our [Animal Welfare policy](#).

Product Quality and Sustainable Innovation

Products and services delivered by our suppliers shall meet the quality, safety and sustainability criteria as described in the contract documents with PP Group and applicable legislation. If relevant for the delivered product or service, and in case of innovation practices or product development, suppliers have to be able to demonstrate that internationally accepted sustainable and ethical guiding principles are taken into account during these practices.

Waste and Water Management

As a company operating a fleet of vessels, dependent of the sea as source of income and our stewardship, the prevention of pollution at sea is one of our main priorities. Therefore, as PP Group we commit to minimizing waste and pollution, preserving natural resources and promoting fresh water savings. Every vessel that falls under PP Group has its own waste policy, including waste water procedures. We expect that our suppliers have in place their own policy and program when it comes to waste and water management, relevant in their specific business

operations.

Carbon Emission Reduction

More than 25 percent of greenhouse gas emissions come from food production.

Although on average, seafood has a smaller carbon footprint than other animal proteins, because fishing doesn't require farmland or care of livestock, this does not relieve us of the obligation to try to minimize our carbon footprint. In this reality, we measure the footprint of our activities, investigate in our processes, and take on a continuous base, initiatives and projects for further reduction of our carbon footprint. This applies to our fishing activities, our processing, storage and logistic processes, and our offices. As part of this Supplier Code of Conduct, we encourage our suppliers to develop and implement their own carbon program to contribute to a low carbon fishery sector.

Confidential Information, Privacy and Protection of Personal Data

PP Group expects of all its suppliers and their employees that they safeguard all of their internal confidential information, such as policies documents, reports or data sheets, as well as any confidential information received from PP Group or other stakeholders and third parties, including the protection of personal data. Failure to do so could result in a breach of obligations arising under contracts or laws protecting business secrets, data protection, and privacy. Confidential information must not in any case be disclosed to anyone outside of supplier's own or PP Group's organization(s). Confidential information must not be shared with others except on a "need-to-know" basis. Supplier shall ensure that all employees are obliged to protect confidential information, even after employment or business ends.

Please read our [Privacy Statement](#).

Adherence to the Supplier Code of Conduct, Audits and Non-compliance

PP Group reviews compliance with the Supplier Code of Conduct and has the right to undertake an assessment with any supplier. We expect suppliers to undertake an assessment in its own operations and throughout its supply chain in this regard. This Supplier Code of Conduct applies to all stages of the supply chain. The supplier that is in direct relation with PP Group shall be responsible and liable for assuring compliance to the extent that is possible within their sphere of influence and efforts, as mentioned before. In all cases of self-assessment, formal audit or plant visit, suppliers shall be responsible that records are taken and retained and upon PP Group's request handed over to PP Group's procurement team; and to obtain supplier's general approval to grant PP Group (or the appointed expert) access to their sites and documents.

The Supplier Code of Conduct includes the right to make unannounced visits and unlimited access to all areas, documents and workers by PP Group or a designated third party to evaluate the ethical and sustainable behavior with respect to this Supplier Code of Conduct. Relevant documentation must be maintained at all times.

Breaches and non-compliance

Any violation of the principles and requirements set out in the Supplier Code of Conduct is considered to be a significant impairment to the contractual relationship with our suppliers. If there is a suspicion of non-compliance

with the principles and requirements of the Supplier Code of Conduct (e.g. negative media reports), PP Group reserves the right to demand information about the relevant facts. Furthermore, PP Group has the right to terminate immediately and without any form of liability any or all contractual relationships with suppliers who demonstrably fail to comply with the Supplier Code of Conduct or who do not strive for and implement improvement measures after having been given a reasonable deadline by PP Group.

PP Group fosters an open culture in which our own employees, and our suppliers and their employees, will report on actual or suspected breaches without any fear of retaliation.

Reporting on breaches can be done via csr@pp-group.eu.

