



SUPPLIER
Expectation Manual

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Introduction

Quality Assurance and Food Safety are the cornerstones of Culimer USA’s business philosophy and the dedication to these principles guides us as we build our network of suppliers of the world's best clean and natural sushi ingredients. At Culimer USA, we believe that our suppliers of raw materials, packaging materials, logistics, storage and distribution, and other quality partners are an integral part of our company. We hold our supply chain network in high regard and strive to build a strong relationship with our suppliers.

This supplier expectation manual outlines the minimum set of quality programs that form the foundation of our supplier food safety & quality systems along with our business code of conduct. We are committed to delivering safe and high-quality food products through the development, implementation, and maintenance of procedures that comply with our policies, applicable international, federal, state, and local laws and regulations, and Global Food Safety Initiative Standards (GFSI). We expect our suppliers to embrace these programs and cultivate a culture of continuous improvement in food safety and quality, exceeding our minimum expectations.

Culimer USA ensures that all products we supply are produced in accordance with the Food and Drug Administration (FDA), Food Safety Modernisation Act (FSMA) 204 along with Section 402 of the U.S. Federal Food, Drug and Cosmetic (FD&C Act) Act. In an ongoing effort to deliver the safest and highest quality food products Culimer USA has implemented into practice the requirements of 21 CFR part 123.12 Seafood HACCP as per Fish and Fishery Hazards & Controls Guidance, 4th Edition, 21 CFR 117 Current Good Manufacturing Practices, & Standard Sanitation Operating Procedures. In addition, our FDA Parasite Destruction Standard for seafood meant for raw consumption is as follows:

- All frozen fish have been frozen for a minimum of seven (7) days prior to delivery and maintained at a maximum of -4°F (-20°C) during storage and transit.
- All farm-raised products are raised solely on heat-treated pellet-feed that does not contain any fish waste of any kind, is free of internal and external parasites and does not contain any banned substances.
- All fish raised in open-water are raised in net pens [3-402.11 (B)(4)(a)]
- All fresh fish stored and transported are maintained at a maximum temperature of 40°F (-4.4°C)
- Upon request, COA per shipment can be available for review

Table 1: Supplier Expectation Food Safety & Quality Requirement

Compliance Expectation	Mandatory/ Strongly Advised
FDA Registration (If not exempt)	Mandatory
GFSI Certified	Strongly Advise
Seafood HACCP (Fish and Fishery Hazards & Critical Controls Points Guidance)	Mandatory
FSMA Traceability Rule 204	Mandatory
Preventive Controls and Canadian Food Inspection Agency (CFIA)	Mandatory
USDA (veggies,fruit, dairy)	Mandatory
Seafood Import Monitoring Program (SIMP)	Mandatory

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Suppliers' Responsibilities/Expectations

We expect our suppliers to adhere to the following requirements:

- Compliance with all government regulations and company standards (e.g., GFSI, FDA, HACCP, GDST Traceability)
- Submission of required documentation such as supplier/material approval questionnaire, certificates of analysis, product specifications, etc.
- Use of Culimer USA-approved ingredients, materials, and suppliers
- Implementation of appropriate food safety and quality management systems
- Cooperation with our audits and inspections
- Prompt and effective communication with us regarding any quality or safety issues that arise
- No changes to any products without written notice & agreement
- Provide all relevant documents within 30 days

Details of Our Process

Our Supplier and Material Approvals are conducted using 3iVerify. 3iVerify is a cloud-based food safety and quality management system which allows for a seamless, collaborative process between our food safety and quality teams . All questionnaires are issued through 3iVerify, and suppliers are required to respond and complete the questionnaire in a timely manner..




Account Set-up

Suppliers will be established following this process:

1. Signed receipt and acknowledgment of this Supplier Expectation Manual and Code of Conduct
2. Supplier Approval questionnaire and document uploads completed in 3iVerify.
3. Material Approval questionnaire and document uploads completed in 3iVerify.

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Supplier Approval

GFSI Suppliers	Non-GFSI Suppliers
 <p>If you already maintain a GFSI certification, the supplier approval process is short and straightforward.</p> <ul style="list-style-type: none"> Complete the 3iVerify Questionnaire; confirm contact details, including emergency details for recalls/product withdrawals; and upload the following: <ul style="list-style-type: none"> Valid GFSI Certificate Recent audit report (in English) HACCP Letter of Guarantee (annually) HACCP Plan (in English) signed and dated by a qualified individual (including training records) <ul style="list-style-type: none"> Provided annually after review Any applicable Regulatory documents Any other documentation as needed e.g., Sanitation SOPs, Recall/Withdrawal Policies, or Allergen Procedures 	<p>Suppliers, who are not GFSI certified must upload the following to 3iVerify:</p> <ul style="list-style-type: none"> Non-GFSI Supplier Questionnaire Recent Traceability exercise HACCP Plan (in English), Hazard Analysis, Risk Assessment, Process Flow Diagram Sanitation Procedures Monitoring Records such as Time & Temperature Monitoring Logs, Raw material receiving logs, thermometer calibration log, or production logs. HACCP Letter of Guarantee Allergen Program Procedures Product Recall/Withdrawal Program Food Defense Program Vulnerability Assessment for Food Fraud Environmental monitoring program Good Manufacturing Program/Sanitation SOP's Emergency Contact List HACCP or PCQI training records

Supplier Performance Monitoring and Review

Annual supplier performance monitoring is a crucial aspect of our commitment to ensuring the highest quality standards and maintaining strong relationships with our suppliers. Each year, we conduct a comprehensive evaluation of our suppliers to assess their performance and ensure alignment with our expectations. This evaluation includes factors such as product quality, delivery reliability, responsiveness to inquiries, adherence to agreed-upon specifications, and compliance with applicable regulations. The purpose of this annual monitoring is so that we may jointly identify areas of strength, recognize outstanding performance, and address any opportunities for improvement.

Material Approval

All materials must pass our material approval program. Manufacturers will be issued a material approval questionnaire through 3iVerify and will be required to submit the following documentation:

- Claim Documents
- Nutritional Analysis, Third Party Validated
- Allergen Procedure
- Authenticity/Integrity Statement
- Product Specifications
- Completed GFSI Audit Report to verify the product is within scope
- Case and/or Nutrition Facts Labeling
- Signed HACCP Plan including Process Flow, Hazard Analysis, and CCP Plan
- Certificate of Analysis for agreed-upon microbiological and chemical standards
- Packaging Examples (Logistical Information)

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Product Specifications

Suppliers are required to provide specifications for the products they are supplying, signed by both parties. Culimer USA may also develop specifications for new products which will then be agreed upon by the supplier. The product specifications clearly define all supply requirements such as microbiological testing requirements for COA, packaging, and transportation requirements.

The final specification must be agreed upon and signed by the supplier confirming acceptance. Product specifications are reviewed every 3 years unless there are changes to the product. Suppliers must immediately inform Culimer USA of any changes to the product or labelling within 48 hours and submit for approval.

Product Testing

The supplier is responsible to ensure that the products your company provides meet our agreed-upon specifications, including microbiological standards.

Suppliers are required to provide a certificate of analysis from an ISO/IEC 17025-certified laboratory for each product delivered.

Production Monitoring

Culimer USA is committed to ensuring the quality and safety of our products through rigorous production monitoring. For new suppliers or those products deemed high-risk based on our risk assessments, Culimer USA will conduct on-site production monitoring to oversee the production process and ensure it meets Culimer USA standards. Our trained personnel, or personnel from a certified third-party service provider will observe the entire production process, from raw materials handling to finished product packaging, to identify any potential issues and recommend corrective actions, as necessary. This monitoring program is an essential component of our food safety management system and demonstrates our commitment to producing safe, high-quality products.

Complaint Handling

Complaints are a normal part of business. While not every event represents an actual problem, each one is investigated thoroughly. The supplier shall provide a complete report including root cause analysis and CAPA within 48 hours of receiving the complaint. Preventive actions will be discussed, and a comprehensive response must be submitted and agreed upon to close each issue.

Effective communication is vital throughout this process. We expect suppliers to be transparent and responsive to our inquiries and provide regular updates on the status of the investigation and any corrective action being taken. We believe that open communication is the key to resolving issues quickly and maintaining a positive relationship between our companies.

Out-of-Specification Products

In the event that a product is deemed out of specification, Culimer USA expects its suppliers to take full responsibility for their product. This includes providing credit for any products that are out of specification. Suppliers should have procedures in place to investigate the root cause of the issue and implement corrective actions to prevent it from happening again. Culimer USA reserves the right to request additional testing or to reject any product that does not meet our specifications. We believe that working together with our suppliers to ensure the highest quality products is essential to maintaining strong business relationships and meeting the expectations of our customers.

Ongoing Compliance

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As a supplier, maintaining continuous compliance is crucial for the success of our partnership. To ensure compliance, we utilize a database called 3iVerify, which we require all suppliers to use. This database serves as a centralized location for suppliers to manage and maintain all their compliance documentation. It also provides automated notifications for document expiration dates.

Suppliers must upload and update all necessary compliance documents into 3iVerify regularly.

These documents include, but are not limited to:

- GFSI audit certificates (Annually)
- Complete audit reports in English (Annually)
- HACCP Letters of Guarantee (Annually)
- FDA Registration (Bi-annually)
- HACCP Plan signed and dated (Annually)



It is your responsibility to maintain ongoing compliance with the required documentation using 3iVerify. Failure to do so may result in delays in shipping and possibly the termination of the partnership.

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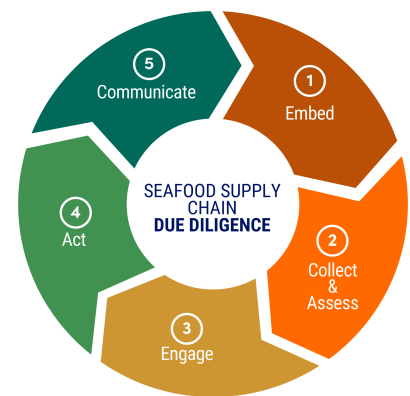
Culimer USA’s Sustainable Seafood Program

Culimer USA LLC recognizes the importance of conserving the natural environment, preventing the depletion of natural resources (UN SDG 12 & 14), and upholding labor rights throughout our supply chains and in our company (UN SDG 3 & UN SDG 10). Culimer USA’s core purpose, to **Enrich Society Through Food**, supports people’s daily lives along the entire supply chain, from bait to plate. As an influential buyer, importer, and distributor of seafood from global producers, Culimer USA has developed and embedded resources detailing the company’s commitments and expectations of its supply chain partners:

- **Sustainability & Tuna Sourcing Commitment:** Culimer USA recognizes that tuna has unique traceability, environmental, and social responsibility challenges that require a distinct approach.
- **Supplier Code of Conduct:** This is a foundational element of Culimer USA’s operations. The Code of Conduct ensures that everyone involved in Culimer USA’s supply chain upholds the highest safety and quality standards through systematic control.

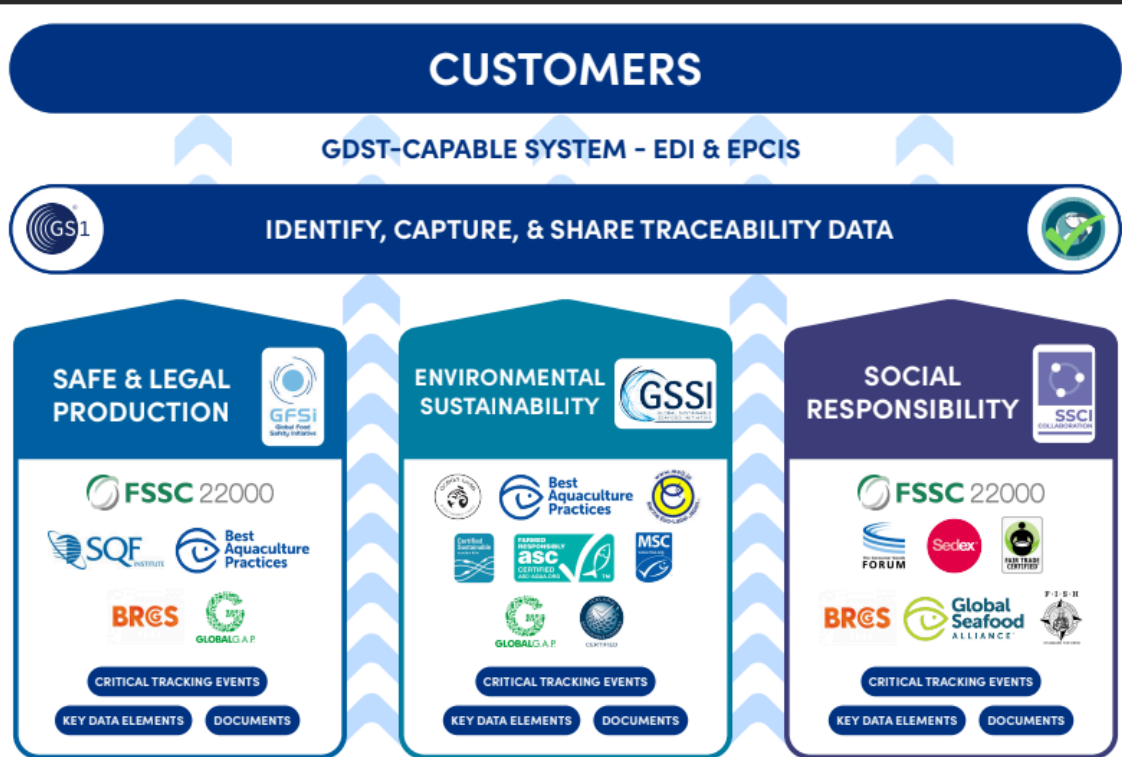
Approach

To achieve our vision and make progress toward our goals, we will use our due diligence framework (see right) to systematically and proactively address the environmental and social impacts within the seafood supply chain. Culimer USA defines ‘Sustainability’ based on the United Nations’ definition as **“.....meeting present needs without compromising future generations’ ability to meet their needs.”** (UN, 2023).



Culimer USA’s Sustainable Seafood Program and commitments will be continuously updated as best practices for traceability and sustainability evolve. Culimer USA stays apprised of best practices by prioritizing partnerships and pre-competitive collaborations. Culimer USA commits to engaging in its supply chains as our due diligence framework outlines. It will continue taking action in pre-competitive forums and advocacy to positively impact fisheries and aquaculture production’s social, economic, and environmental outcomes.

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1) Safe and Legal Production

Culimer USA maintains rigorous quality control measures to deliver safe and high-quality food products by developing, implementing, and maintaining procedures that comply with our policies, applicable international, federal, state, and local laws and regulations, and Global Food Safety Initiative Standards (GFSI). Culimer USA complies with U.S. federal programs and policies are the recordkeeping needed to provide safe and legal products to its customers:

- NOAA [SIMP](#) is a risk-based traceability program requiring importers to provide and report key data from the point of harvest to entry into U.S. commerce. It includes 13 seafood species groups to combat [illegal, unreported, or unregulated \(IUU\)-caught and/or misrepresented seafood](#) from entering U.S. commerce.
- FDA [FSMA Section 204](#) requires that persons who manufacture, process, pack, or hold foods on the FTL, maintain records containing Key Data Elements (KDEs) associated with specific Critical Tracking Events (CTEs); and provide information to the FDA within 24 hours or within some reasonable time to which the FDA has agreed.
- CODEX [Hazard Analysis Critical Control Point](#) (HACCP) addresses food safety by requiring detailed control strategies (i.e., plans) to mitigate biological, chemical, and physical hazards from raw material production, procurement, and handling to manufacturing, distribution, and consumption of the finished product.

Culimer USA is committed to:

- Combating IUU fishing issues through thoughtful purchasing and vigilant monitoring, and will never knowingly purchase or sell any products associated with IUU fishing
- Full FSMA Section 204 compliance by 1st January 2026
- Collect and review supplier HACCP plans and HACCP Letter of Guarantees annually as outlined in [21 CFR 123.12](#)

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2) Environmental Sustainability

Culimer USA’s sourcing seeks to minimize and prevent long-term impacts on the broader ecosystem. Culimer USA recognizes the importance of reducing bycatch and its impact on the marine ecosystem’s long-term sustainability and the fishing industry’s economic viability.

Culimer USA is committed to:

- Holding an MSC and ASC Chain of Custody Certification
- Sourcing products with [GSSI](#)-recognized certifications
- Sourcing from credible FIPs and aquaculture improvement projects with a time-bound improvement plan and transparently reporting¹ on measurable progress.
- Sourcing from other resources that meet Culimer USA’s high standards contained herein.
- Collaborating with stakeholders to promote best practices and sustainable fishing methods that improve fishing practices, such as using circle hooks and adopting best practices for handling and releasing bycatch

3) Social Responsibility

Culimer USA recognizes the importance of addressing social responsibility in seafood supply chains. Culimer USA acknowledges that the seafood industry has recorded human rights violations, and it aims to work in collaboration with suppliers and industry groups to identify, assess, and mitigate any relevant occurrences within its seafood supply chain. As a company implementing the Global Tuna Alliance 5-Year strategy, Culimer USA’s social responsibility efforts include prioritizing implementing the Employer Pays Principle, compliance with the International Labour Organization’s Convention 188, observer safety, and the International Maritime Organization Cape Town Agreement by 2025.

Culimer USA is committed to:

- Support and implement the new standards for seafood under the [Sustainable Supply Chain Initiative](#) (SSCI) standard
- Prioritize sourcing from fisheries or farms that have implemented documented processes to comply with responsible practices related to human and labor rights.
- Implementing comprehensive due diligence processes, proactive actions with supply chain partners, focused on high-risk supply chains, and regular public reporting²
- Working with suppliers to resolve and remedy any issues that arise through a 12-month remedial process, followed by a reassessment
- Engaging with industry groups to tackle complex industry issues collectively (e.g., Global Tuna Alliance, World Benchmarking Alliance Seafood Stewardship Index).

Traceability

Supply chain traceability creates the foundation for Culimer USA’s commitment to sourcing food that is 1) produced safely and legally, 2) environmentally sustainable, and 3) socially responsible. Traceability is the ability to identify and trace the history of a seafood product throughout the supply chain. To trace a product back to its origin, key data elements (KDEs) are collected at critical tracking events (e.g., harvest, processing, shipping, etc.). Our company adheres to the [Global Dialogue for Seafood Traceability](#) (GDST) standard, and the GDST Basic Universal List of KDEs provides a comprehensive written guide to data points, their definitions, and how they are reported. The GDST standard eliminates all possible questions about definitions, facilitates interoperable data sharing, improves information verifiability, and reduces data reporting burdens.

¹[FisheryProgress.org](#) is preferred. If FisheryProgress.org is not used, a credible alternative platform must include all public reporting elements required by FisheryProgress.org to maintain an active profile, including any applicable social responsibility requirements.

² Culimer USA aligns with the U.S. Customs and Border Protection’s [Reasonable Care Guidelines](#).

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Traceability is essential for supply chain management and food safety. At Culimer USA, we also leverage traceability data to evaluate sustainability, uphold social responsibility, and mitigate potential risks of IUU fishing in our supply chains. We collect traceability data in compliance with US Federal programs (e.g., FSMA Section 204, HACCP, SIMP) and to meet customers’ expectations. We consider our suppliers & customers to be our partners. We actively participate in pre-competitive and industry groups to stay updated on best practices for traceability. Because of this, Culimer USA implements electronic traceability data collection and sharing through interoperable GDST-capable software platforms to meet both customer demands and industry best practices.

Culimer USA has committed to:

- Implementing the GDST standard and utilizing [Verified GDST-Capable](#) traceability vendor.
- Collaborating closely with each supplier to convey the needs clearly and collaborate to deliver the data needed.
- Collecting traceability data as guided by legal, customer, and industry requirements.

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Culimer USA’s Seafood Supplier Expectations

Culimer USA has implemented a set of expectations that we expect all suppliers to comply with (see below graphic). These are essential in upholding our commitment to food safety and quality, seafood traceability, and responsible and sustainable sourcing. The expectations below include but are not limited to, conducting due diligence, maintaining documentation, and having internal controls in place to identify, mitigate, and remediate any issues.

Culimer USA’s QA Department will collaborate closely with each supplier to understand their specific needs and customize the traceability process accordingly. This collaboration ensures that the traceability information provided meets our strict standards and aligns with our company’s goals. Depending on product or source-specific risks, our company may require additional risk-mitigation measures. Such measures may include further training, onsite audits, incoming/outgoing QA oversight, sourcing and operational changes, or implementation of specific GFSI-benchmarked certification.

By adhering to these expectations and collecting and sharing required key data elements (KDEs) (Table 1), suppliers demonstrate their commitment to responsible practices and contribute to our collective efforts to promote transparency, traceability, and sustainability in the food supply chain.

Traceability

- ✓ Suppliers shall provide electronic traceability data using a Verified GDST-Capable solution to ensure that the origin and movement of products can be accurately tracked and verified.
- ✓ Suppliers shall capture and share the required KDEs (Table 1), Chain of Custody data, and documentation, and comply with relevant legal requirements (FSMA 206, SIMP, HACCP).
- ✓ All seafood shall be fully traceable from the point of catch/harvest (i.e., fishery, aquafarm, ranch).

Safe & Legal Production

- ✓ Suppliers shall be certified to a GFSI standard. If not certified to GFSI standards, a letter of intent committing to certification must be provided.
- ✓ Suppliers shall fully comply with relevant U.S. legal requirements (FSMA 204, SIMP, HACCP).
- ✓ Suppliers shall align to standards outlined in the US Customs and Border Protection [Reasonable Care](#) guidelines.
- ✓ Suppliers shall provide a HACCP Plan in English, signed and dated by a qualified individual, and a HACCP Letter of Guarantee with current training records for the HACCP plan signatory.

Environmental Sustainability

- ✓ Seafood items shall come from fisheries/farms certified to one of the GSSI standards.
- ✓ For non-certified seafood, or other Culimer USA-accepted products, improvement projects will be assessed on a case by case basis and can include:
 - Comprehensive FIPs with a progress rating of at least C are listed on FisheryProgress.org.
 - Prospective FIPs or improvement projects demonstrating a commitment to a time-bound improvement process and transparent reporting.
 - Comprehensive aquaculture improvement projects³.

Social Responsibility

- ✓ At a minimum, a supplier-partner commitment to upholding international standards (Universal Declaration of Human Rights, ILO Declaration on Fundamental Principles and Rights at Work, UN Guiding Principles on Business and Human Rights, FAO Guidelines for Small-Scale Fisheries, OECD Guidelines for Multinational Enterprises)
- ✓ As Culimer USA implements the SSCI standard, it will prioritize suppliers sourcing seafood from fisheries, farms, and processors certified to meet the Sustainable Supply Chain Initiative (SSCI) Standards.

³ Comprehensive aquaculture improvement projects could include improvement projects with varying approaches (e.g., regional, jurisdictional) and will be assessed on a case-by-case basis.

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Culimer USA’s Key Data Elements Required for Traceability

The key data elements (KDEs) listed in Table 1 must be reported to Culimer USA through a verified GDST-Capable solution (e.g., Trace Register, Whole Chain) for each product or seafood source on a per-purchase order or shipment basis. These KDEs are organized by critical tracking event (CTE) and align with the Global Dialogue on Seafood Traceability 1.2 standards, which were created by the seafood industry to help standardize data collection across the seafood supply chain. Required KDEs are included to 1) meet legal requirements, 2) customer expectations, 3) industry best practice, and 4) assess Culimer USA’s environmental criteria. Culimer USA’s QA department will work with our suppliers on the required KDEs.

Table 1. A list of KDEs are required to share with Culimer USA for wild and farmed seafood products.

Traceable Object Information: product identification information to be collected for all CTE below and shipping <ul style="list-style-type: none"> ● Product Ownership (during ownership transfer, suppliers must capture the source and destination description of owning parties) ● GTIN (e.g., linking product identifier that meets FSMA 204 requirement for traceability lot code) ● Product Form ● Weight/Quantity ● Species 		
Production Method: Wild	Production Method: Farmed	
Fishing CTE <ul style="list-style-type: none"> ● Production Method (<i>wild</i>) ● Gear Type ● Catch Area (granularity depends on species/fishery) <ul style="list-style-type: none"> ○ FAO Major Fishing Area or Sub-areas ○ Exclusive Economic Zone (EEZ) ○ Regional Fishery Management Organization (RFMO) ○ Sub-national permit areas (e.g., Alaska) ● Date(s) of Capture (e.g., harvest date) ● Vessel Name ● Vessel Registration ● Vessel Flag ● Harvest Certification (<i>when applicable</i>) <ul style="list-style-type: none"> ○ Certification type and valid certification code (e.g., MSC and MSC code) ● Fishery Improvement Project (<i>when applicable</i>) <ul style="list-style-type: none"> ○ FIP name and member sourced from 	Location Master Data (<i>required for all farmed CTEs</i>) <ul style="list-style-type: none"> ● Location Name ● Location ID (e.g., facility license/authorization) ● Location Geo-Coordinates or Address (GLN) ● Location Country 	
		Hatchery CTE <ul style="list-style-type: none"> ● Harvest Certification (<i>when applicable</i>) <ul style="list-style-type: none"> ○ Certification type and valid certification code (e.g., BAP H code)
		Feedmill CTE <ul style="list-style-type: none"> ● Harvest Certification (<i>when applicable</i>) <ul style="list-style-type: none"> ○ Certification type and valid certification code (e.g., BAP M code)
		Farm CTE <ul style="list-style-type: none"> ● Farm Site Name ● Date of Harvest ● Farming Method (e.g., pond, cages, reservoir, etc.) ● Harvest Certification (<i>when applicable</i>) <ul style="list-style-type: none"> ○ Certification type and valid certification code (e.g., ASC chain of custody code or BAP F code)
On Vessel Processing CTE (<i>when applicable</i>) <ul style="list-style-type: none"> ● Product Origin ● Chain of Custody Certification (<i>when applicable</i>) 		
Transshipment CTE (<i>when applicable and required by SIMP</i>): <ul style="list-style-type: none"> ● Transshipment Vessel Name ● Transshipment Vessel Unique ID ● Transshipment Location ● Dates of Transshipment ● Chain of Custody Certification (<i>when applicable</i>) 		
Landing CTE (<i>required by SIMP and FSMA 204</i>) <ul style="list-style-type: none"> ● Landing Location ● Dates of Landing ● Landing Authorization 		
Processing CTE (<i>required for U.S. labeling laws and FSMA 204 for certain products</i>) <ul style="list-style-type: none"> ● Product Origin (e.g., COOL) ● Expiry/Production date ● Chain of Custody Certification (<i>when applicable</i>) 	Processing CTE (<i>required for U.S. labeling laws and FSMA 204 for certain products</i>) <ul style="list-style-type: none"> ● Product Origin (e.g. COOL) ● Production date ● Harvest Certification (<i>when applicable</i>) 	

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(e.g., MSC chain of custody code)	○ Certification type and valid certification code (e.g., ASC chain of custody code or BAP F code)
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Key Terms and Definitions

At-sea Transshipment: Transfer fish, supplies, or other cargo between vessels. In seafood supply chains, fishing vessels at sea offload the catch to a large refrigerated transport vessel (known as “carriers” or “reefers”).

Child Labor: Work performed by a person who is under the minimum legal working age to be employed as determined by (i) a Business’s or Supplier’s policy,(ii) the law of the jurisdiction in which the work will be performed, or (iii) the International Labor Organization Minimum Age Convention No. 138 - whichever indicates the higher minimum age requirement.

Critical Tracking Event (CTE): Instances where a product is moved between premises, is transformed, or is otherwise determined to be a point where data capture is necessary to trace a product⁷.

EEZ: The Exclusive Economic Zone is an area of coastal water and seabed within a certain distance of a country’s coastline, to which the country claims exclusive rights for fishing, drilling, and other economic activities.

FAO: Food and Agriculture Organization of the United Nations. The [FAO](#) defines major fishing areas which are used for fisheries management and jurisdictional purposes.

Fishery Improvement Project: A multi-stakeholder initiative designed to improve fishery sustainability. These projects involve collaboration between fishers, processors, suppliers, retailers, NGOs, and sometimes governments, aiming to address environmental challenges and improve fishing practices.

Forced Labor: Includes all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered themselves voluntarily⁴, encompassing traditional practices of forced labor as well as new forms of forced labor such as human trafficking⁵.

Human Trafficking: Human trafficking involves the recruitment, harboring, transportation, provision, or obtaining of a person for labor or for the purposes of a commercial sex act through the use of force, fraud, or coercion or for the purposes of subjection to involuntary servitude, peonage, debt bondage or slavery.

IMO Number: International Marine Organization number; an identification number allocated to a [specific maritime vessel](#).

IUUF: Illegal, unreported, and unregulated fishing.

Labor Trafficking: The act of recruiting, harboring, transporting, providing, or obtaining a person for involuntary labor or services employing force or physical threats, fraud or deception, or other forms of coercion.

Remediation: Activities, systems, policies, or procedures that Culimer USA or supplier establishes to address and remedy confirmed instances of human trafficking or forced labor, including child labor, in its operations.

Remedies: Financial or nonfinancial compensation awarded to victims of human trafficking or forced labor, including child labor.

⁴ International Labour Organization (ILO). Forced Labor Convention, 1930

https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029

⁵ ILO, General Survey on the fundamental Conventions concerning rights at work in light of the ILO Declaration on Social Justice for a Fair Globalization , Report of the Committee of Experts on the Application of Conventions and Recommendations, 2012, ILC.101/III/1B, para. 272.

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RFMO: Regional Fisheries Management Organization (e.g., International Commission for the Conservation of Atlantic Tunas (ICCAT))

Supplier: Organizations and individuals in Culimer USA’s supply chain who contract directly with Culimer USA or a supplier of Culimer USA.

Supply Chain: Any organizations or individuals involved in supplying, producing, processing or distributing Culimer USA’s products from the point of origin to the point of sale, as applicable.

Time-bound Improvement Process: A time-bound improvement process is an internal, formalized agreement between Culimer USA and a supplier regarding a timeline for compliance with Culimer USA’s Policy.

Traceability: The ability of each stakeholder in the supply chain who takes possession of the product to systematically identify a unit of production, track its location and associated sources (see KDE Table), and describe any treatments or transformations at all stages of production, processing, and distribution. This traceability must enable the product to be traced back to its original source(s) and comply with all applicable government regulations, such as the Seafood Import Monitoring Program (SIMP).

Trafficking-related activities: All activities that directly support or promote Labor Trafficking or Child Labor, including but not limited to:

- (i) using misleading or fraudulent recruitment practices during the recruitment of employees, such as failing to disclose basic information or making material misrepresentations regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, living conditions and housing (if employer-provided or employer-arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work;
- (ii) charging employees recruitment fees; and
- (iii) destroying, concealing, confiscating, or otherwise denying access by an employee to the employee’s identity documents, such as passports or drivers’ licenses⁶.

Verifiable Source: Culimer USA, or parties authorized by Culimer USA (e.g., FishWise), can at any time request, and the supplier will provide, data or documents to verify the legality, traceability, or source information of a product’s seafood ingredients. A source is verifiable if the requested data or documents can be proven accurate.

⁶ Tracking-related activities refer to those actions, usually employed by labor brokers, to facilitate Labor Tracking and Child Labor. These model policies use the definition contained in Executive Order 13627 issued by President Obama on September 25, 2012.

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Business Code of Conduct

At Culimer USA, we are dedicated to conducting our business with the highest standards of integrity, transparency, and ethical behaviour. Our commitment to ethical conduct guides every aspect of our operations and interactions with employees, customers, suppliers, and stakeholders. The Culimer USA Business Code of Ethics outlines the principles and values that govern our conduct and serves as a foundation for building trust, respect, and accountability in all our endeavors.

To Conduct Fair and Appropriate Transactions and Business Activities The management team and employees of Culimer USA will, based on the Code of Business Ethics below, comply with relevant laws and regulations, international treaties, and rules effective within our Group with sincerity and high ethical standards to carry out fair and appropriate transactions and business activities with our business partners.

Our Business Partners include, but are not limited to, suppliers, service providers, research and development collaborators, and customers.

Code of Business Ethics

Protection of Human Rights

Culimer USA is committed to upholding and respecting human rights in all aspects of its operations. We recognize the inherent dignity and worth of every individual and strive to ensure fair and equitable treatment for all employees, suppliers, customers, and stakeholders.

- (1) We will respect the culture, customs and languages of all countries and regions in which we operate and seek to harmonize with the international society and local communities as much as reasonably possible.
- (2) We will not engage in any activity that will infringe on human rights, including child labor and forced labor. Furthermore, we will make efforts to work with our business partners and not associate with violations of human rights, and will not conduct business with companies and organizations that engage in such activities.
- (3) We will not engage in any form of harassment, discrimination or similar conduct that violates any applicable local law and not cause any trouble to other party(s).

Compliance with Laws, Regulations, International Treaties and Internal Rules and Policies

Culimer USA adheres to all applicable international laws, regulations, and standards governing its business activities. We conduct our operations with integrity and transparency, ensuring full compliance with legal requirements in all jurisdictions where we operate.

- (1) We will observe and adhere to all relevant laws and regulations pertaining to the products and services we handle.
- (2) We will conduct business upon understanding and complying with international treaties and laws and regulations of pertinent countries on trade.
- (3) We will not engage in actions that damage the interest of our subcontractors without proper business or legal justification.

Marketing and Sales Policy

Culimer USA maintains a marketing and sales policy that prioritizes honesty, accuracy, and fairness. We provide clear and truthful information about our products and services, avoiding deceptive or misleading practices that may misrepresent their quality or characteristics.

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- (1) We will always communicate with our business partners with a sense of ethics and carry out operating activities with sincerity.
- (2) We will not perform any act pursuing my own or a third party's interests contrary to the Company's legitimate interests or any act that may damage the trust or honor of the Company or cause any loss or damage to the Company.
- (3) Likewise, we will not perform any act that may damage the trust or honor our business partner(s) or cause any loss or damage to it/them.
- (4) We will work through understanding the needs and preferences of our customers, including consumers, to provide products and services needed from the market.
- (5) We will drive forward operating activities with the goal of generating mutual benefits with our business partners.

Ban on Unfair Practices

Culimer USA prohibits unfair competition, deceptive advertising, price-fixing, and any other practices that may harm consumers, competitors, or the integrity of the market. We compete fairly and ethically, respecting the rights and interests of our competitors and promoting healthy competition in the industry.

- (1) We will work towards preventing unfair practices, which include the unjustifiable usage of company assets.
- (2) We will not engage in actions that cause conflict of interest. In the event it is recognized there is such possibility, we will take appropriate actions upon reporting to and consulting with our department responsible for governance.

Prevention of Corruption

- (1) Whether in the US or abroad, we will not offer improper entertainment, cash, cash equivalent, gifts, benefits and other economic benefits to public employees or persons who are in equivalent positions.
- (2) With the exception of the Company’s formal occasions, we will not offer cash, cash equivalent, gifts and entertainment to our business partners. Likewise, we will not accept gifts and entertainment from our business partners.

Handling of Information and Intellectual Properties

- (1) Concerning information pertaining to our business partners, personal information, intellectual property of the Company and other confidential information, we will work to maintain appropriate management and prevent breach.
- (2) We will comply with laws and regulations of respective countries and regions concerning the use and protection of information and intellectual property.
- (3) Together with recognizing the significance of intellectual property rights and working to appropriately operate and maintain the Company’s intellectual properties, we will not unjustly infringe upon nor use the intellectual properties of others.

Response to violations

Our Policy on Responding to Violations

(1) Culimer USA is committed to promptly investigating and addressing any violations of our business code of ethics. We encourage employees and stakeholders to report any suspected violations through designated channels, and we take appropriate disciplinary action against individuals found to have violated our ethical standards.

Executives and employees who find actions that violate or may violate this Code of Conduct, or constitute unlawful or potentially unlawful activities are encouraged and requested, in accordance with the Company’s Rules on Whistleblower

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Policy, to report to or consult with his or her supervisor or manager, or through phone, a dedicated website or email using an internal or external point of contact, in an identifiable manner or anonymously the conduct observed or of which the employee has become aware.

(2) In the event a violation has been identified or the Company received a report described in the preceding paragraph, the Company will promptly, thoroughly and fairly investigate the facts.

(3) The supervisor or department responsible for governance who receive the reporting or consultation from the whistleblower will not disclose the name or other information of the whistleblower without his or her consent, and will protect the whistleblower from risking unfair treatment.

(4) In the event the investigation results confirm a violation, the Company will impose strict disciplinary measures on the violator in accordance with its Rules on Employment and other policies, as well as adopt measures to prevent reoccurrence.

Personal Responsibility and Non-Retaliation Policy

(1) Every employee of Culimer USA is expected to uphold the principles and values outlined in this business code of ethics. We encourage personal accountability, integrity, and ethical decision-making in all aspects of work, and we strive to create a culture of trust, respect, and responsibility within our organization.

Each of the Company’s management team and employees confirms he or she is responsible for reporting with sincerity in the event a violation or unfair practice has been recognized as a fact, as well as when the likelihood of such actions has been detected.

(2) Each of the Company’s management team and employees will cooperate with sincerity when the Company will hold an investigation.

(3) The Company will hold a strict non-retaliation policy and prohibit retaliation on whistleblowers and cooperators of internal investigations.

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Supplier Acknowledgment

ACTION REQUIRED: Please sign and return this document via email to Culimer USA (qa@culinary-collaborations.com) within 5 business days.

Acknowledgment:

As a supplier to Culimer USA, I acknowledge and commit to complying with the Code of Conduct and Expectations laid out in this manual. I confirm that I have read, understood, and agree to abide by this Supplier Expectation Manual and also acknowledge my responsibility to communicate and enforce these expectations within my organization and supply chain.

We encourage all suppliers to embrace this code as an opportunity to drive positive change, foster sustainable practices, and ensure the delivery of safe, ethical, and high-quality food products.

Supplier Acknowledgement:

By signing this page, I acknowledge receiving a copy of the Culimer USA Supplier Expectations

and Code of Conduct Letter on behalf of _____.

(Company Name)

I further acknowledge that I have fully reviewed and understand the expectations Culimer USA has for my

Company and agree on behalf of _____ to comply with the Policy and the requirements within.

(Company Name)

By signing this document, I also affirm that I am authorised to bind _____ to this Policy and Letter.

(Company Name)

Employee/Owner Name & Title (Please Print):

Signature: _____

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Appendix

Exhibit 1: Key Terms and Definitions

At-sea Transshipment: The transfer of fish, supplies, or other cargo between vessels. In seafood supply chains, fishing vessels at sea offload the catch to a large refrigerated transport vessel (known as “carriers” or “reefers”).

Child Labor: Work performed by a person who is under the minimum legal working age to be employed as determined by (i) a Business’s or Supplier’s policy (ii) the law of the jurisdiction in which the work will be performed, or (iii) the International Labor Organization Minimum Age Convention No. 138 - whichever indicates the higher minimum age requirement.

Critical Tracking Event (CTE): Instances where a product is moved between premises, is transformed, or is otherwise determined to be a point where data capture is necessary to trace a product⁷.

EEZ: The Exclusive Economic Zone is an area of coastal water and seabed within a certain distance of a country’s coastline, to which the country claims exclusive rights for fishing, drilling, and other economic activities.

FAO: Food and Agriculture Organization of the United Nations. The [FAO](#) defines major fishing areas which are used for fisheries management and jurisdictional purposes.

Fishery Improvement Project: A multi-stakeholder initiative designed to improve the sustainability of a fishery. These projects involve collaboration between fishers, processors, suppliers, retailers, NGOs, and sometimes governments, aiming to address environmental challenges and improve fishing practices.

Forced Labor: Includes all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered themselves voluntarily⁷, encompassing traditional practices of forced labor as well as new forms of forced labor such as human trafficking⁸.

Human Trafficking: Human trafficking involves the recruitment, harboring, transportation, provision or obtaining of a person for labor or for the purposes of a commercial sex act through the use of force, fraud, or coercion or for the purposes of subjection to involuntary servitude, peonage, debt bondage or slavery.

IMO Number: International Marine Organization number; an identification number allocated to a [specific maritime vessel](#).

IUUF: Illegal, unreported, and unregulated fishing.

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Company Core Purpose

Purpose: “To Enrich Society Through Food”

What does this mean to Culimer USA?

We are inspired by the B Corporation movement and are currently on the journey to certification. Culimer USA believes in using our business as a force for good to protect our planet’s most valuable resources. We strive to achieve this through a relentless focus on a triple bottom line considering people, planet, and profit.

People

We want to impact people’s lives across the world in a positive way. We inspire our peers and competitors alike to adopt even higher standards in quality and food safety. We’re committed to the journey to become a Certified B Corporation.

Planet

We strive to have a positive impact on the planet by supporting the sustainability of the oceans and farms we work with to safeguard the world’s natural resources for future generations. We aim to protect the environment and its biodiversity, our ecosystem, and the world.

Profit

We introduce North American consumers to authentic, unique, and high-quality ingredients from around the globe that are always natural and never manipulated. We are a mission before-margin company, and while our imperative is to be profitable, it’s so we can continue our mission of enriching society through food.

Core Values

Excellence

We strive for excellence in all that we do by continuously raising the bar, challenging the status quo, and following a path of kaizen.

Accountability

To take responsibility for our actions that impact people and the planet. We inspire others to make decisions that positively impact all involved, from our team to our clients.

Trust

To do what’s right in all things, not because we have to, but because we want to. We are purpose-driven, considering people and the planet before profit in everything we do.

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