



NICHIREI FOODS U.S.A., INC.

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### **CA Transparency in Supply Chains Act Disclosure**

#### **(Nichirei Foods U.S.A., Inc. and Nichirei Seafoods, Inc.)**

The California Transparency in Supply Chains Act requires some manufacturers and retailers doing business in California to report efforts, if any, to eradicate slavery and human trafficking from their supply chain. Nichirei Foods U.S.A., Inc. and Nichirei Seafoods, Inc. (collectively, “Nichirei”) are subsidiaries of the Nichirei Corporation of Japan and part of the Nichirei Group (collectively, “Group”). As such, Nichirei is subject, and operates pursuant, to the Group’s policies, including the Nichirei Group Human Rights Policy (“Human Rights Policy”)<sup>1</sup> and the Nichirei Group Code of Conduct (“Code of Conduct”),<sup>2</sup> both of which contain specific provisions addressing human trafficking, forced labor, and slavery.

The Group respects human rights and never discriminates on the basis of race, color, gender, religion, political views, nationality, social position or national origin. The Group does not permit nor tolerate any form of human trafficking, forced labor, or slavery.

All of the Group’s business partners, including, Nichirei’s supply and distribution partners, are held to understand and comply with the Human Rights Policy and the Code of Conduct. Further, Nichirei’s supply and distribution agreements contain specific representations and warranties that all products and services for Nichirei are in compliance with all applicable federal, state and/or provincial, regional, municipal, and local laws, codes, regulations, rules, ordinances, decrees, permits, registrations and orders. Nichirei specifically highlights the requirement to comply with laws addressing human trafficking, forced labor and slavery. Nichirei requires that its business partners comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. In addition, Nichirei often has the right to audit supply chain partners including

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<sup>1</sup> Available at: <https://www.nichirei.co.jp/english/corpo/humanrights.html>.

<sup>2</sup> Available at: <https://www.nichirei.co.jp/english/corpo/management/regulation.html>.



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inspections to ensure compliance with applicable laws and contractual requirements. Nichirei has specifically done so in the past with respect to anti-slavery and anti-human trafficking laws and requirements, using third-party verifiers.

The Group broadly distributes its policies, including the Human Rights Policy and the Code of Conduct, to ensure Group-wide compliance. This includes translating them appropriately into the languages used in the countries and regions where it does business. The Group also provides ongoing training and education to officers and employees, including internal training sessions addressing issues such as sustainable procurement and human trafficking, forced labor, and slavery.

The Group has an internal whistleblower hotline and consultation service that enables employees or representatives of employees of the Group and its subsidiaries, and those of its business partners, who feel that their human rights have been violated, or who witness violations of the Group's policies, to make anonymous reports at any time. This is available in all countries and regions where the Group does business, including the United States.

The Group makes publicly available its Environmental, Social, and Governance efforts, including information on human trafficking, forced labor, and slavery, available at: <https://nichirei.disclosure.site/en/>. In addition, more information about the Group's human rights initiatives applicable to Nichirei is available at <https://www.nichirei.co.jp/english/corpo/humanrights.html>.