

CALIFORNIA TRANSPARENCY IN SUPPLY CHAINS ACT OF 2010

Bumble Bee is committed to conducting business ethically and responsibly. In compliance with the California Transparency in Supply Chains Act, we are committed to implementing robust policies and procedures that promote transparency, accountability, and continuous improvement throughout our operations and supplier relationships. The following disclosure outlines the steps we take to prevent and address risks of forced labor and human trafficking in our supply chain:

- Product Supply Chain Verification. As part of onboarding new direct suppliers, the Company ensures that the suppliers receive and understand the Company's *Supplier Code of Conduct*. First tier suppliers certify that materials incorporated into the Company's products comply with the laws regarding slavery and human trafficking of the country or countries in which they conduct business through their agreement to comply with our Supplier Code of Conduct.

Each new supplier's information is submitted to a third-party service provider for risk assessment at the time of onboarding. This provider utilizes a comprehensive due diligence program that includes screenings, reports, and continuous monitoring. Suppliers are screened against an extensive risk intelligence database, which covers regulatory lists, media publications, and adverse media profiles. Automated risk scoring processes analyze data from various sources to support holistic risk management. Importantly, this third-party service continues to monitor suppliers after onboarding and promptly alerts the Company to any new findings or risks associated with those suppliers. This ongoing, third-party verification process helps ensure that our supply chain remains free from risks related to human trafficking and slavery.

- Supplier Auditing. The Company's supplier social audit policy requires direct land-based suppliers to agree to recurring SMETA 4-pillar social audits. These audits verify supplier compliance with standards focusing on labor practices, environmental responsibility, and ethical business conduct. Audits must be unannounced or semi-announced, and conducted by an auditing company that is Sedex Approved and APSCA-certified. As part of this process, the Company reviews the extent of controls that suppliers have in place to ensure compliance with Company standards regarding human trafficking and slavery.
- Internal Accountability Standards. The Company has an internal compliance program that includes a Code of Conduct that addresses human trafficking including a requirement for employees to immediately report any suspicion any activity impacting human rights. The Company also maintains a platform through which team members can anonymously report any concerns. The Company commissions third-party, independent social audits of its own facilities on a regular basis.
- Training. The Company provides all its salaried employees (which encompasses all employees making contracting or purchasing decisions) regular third-party developed, online training on forced labor and human trafficking and slavery.