

California Transparency in Supply Chains Act Notification

As a leading global importer and processor, Harvest of the Sea has been providing culinary professionals with delicious, superior quality seafood for over fifty (50) years. It continues to be both a pioneer and world leader in premium shrimp and seafood products. The core values of its founder continue to drive industry standards and set Harvest of the Sea apart from other seafood companies. The company is committed to the long-term stewardship of our seafood resources and believes in using environmental and socially friendly methods that ensure their sustainability.

As a member of the Global Aquaculture Alliance (GAA or Alliance), Harvest of the Sea adheres to the "Best Practices" model of the Aquaculture Certification Council (ACC) in order to maintain the viability of aquacultured seafood. ACC certification helps to ensure that responsible farming and production techniques are utilized at the hatchery, farm and production stages. This certification provides an assurance to its customers that Harvest of the Sea products are produced with full traceability from certified processing facilities.

Harvest of the Sea also adheres to the overall mission of the GAA to further environmentally responsible aquaculture to meet world food needs. The Alliance encourages the use of responsible production systems that are sustainable regarding environmental and community needs, and efficiently provide safe, wholesome aquaculture products for consumers throughout world. Harvest of the Sea fully adopts this approach.

GAA articulates the importance of aquaculture as a source of food and employment. The Alliance promotes effective and coordinated government regulatory and international trade policies. Its guiding principles include coordination and collaboration with national, regional and local governments in the development and implementation of policies, regulations and procedures necessary and practicable to achieve environmental, economic and social sustainability of aquaculture operations; while also striving to benefit local economies and community life through diversification of the local economy, promotion of employment, contributions to the tax base and infrastructure, and respect for artisanal fisheries, forestry and agriculture.

The GAA Best Aquaculture Practices (BAP) address a variety of topics, including social responsibility in a voluntary certification program for aquaculture facilities. BAP certification defines the most important elements of responsible aquaculture and provides quantitative guidelines by which to evaluate adherence to those practices. Although individual standards vary by facility type, all BAP standards address community and employee relations, conservation of biodiversity, soil and water management, and drug and chemical management.

The BAP Social Accountability standards include the requirement for all applicants to comply with national labor laws, including child labor laws, and mandates employment only of legal documented workers.

The five (5) largest suppliers to Harvest of the Sea account for approximately 75% of its purchases. These suppliers are regularly audited by the largest U.S. retailers on a variety of

topics, including social accountability. As part of those requirements, there is a zero tolerance for child labor, prison labor, slavery and human trafficking violations. Those audits are conducted by independent third party auditing firms. Harvest of the Sea relies on the results of those audits to determine which of its major suppliers are compliant when it comes to a myriad of topics including social accountability, e.g. compliance with child labor, prison labor and slavery and human trafficking laws. At this time, Harvest of the Sea does not independently validate the outcome of the audits conducted by others, nor does it conduct its own audits.

Harvest of the Sea has caused its direct suppliers to certify the materials they incorporate into the products sold to Harvest of the Sea comply with the laws regarding slavery and human trafficking of the country or countries in which they are doing business. Similarly, Harvest of the Sea has a general standard it applies to all of its contractors as well as its employees. Compliance with local laws is mandated. Any significant violations can result in termination whether as a result of actions or inactions by a contractor or an employee.

There is general training provided to employees about the laws to which they are expected to comply. Discussions are had with suppliers about the expectations imposed on them. In addition, Harvest of the Sea looks to the HACCP (FDA's Hazard Analysis and Critical Controls Plan standard) plans that it implements and expects of its suppliers as another means of maintaining the integrity of its supply chains. By focusing on sustainability and product integrity, Harvest of the Sea believes it meets the letter and spirit of this California law which takes effect on January 2, 2012. By making sure no unauthorized access is had to its products from harvesting to receipt, including taking all reasonable steps to insure no contaminants are able to enter the food supply, Harvest of the Sea views its overall compliance efforts as also protecting its supply chain from misuse for purposes of child labor, prison labor, slavery, human trafficking and other social ills which stand to undermine its economic viability and that of its business partners.