

SUPPLY CHAIN TRANSPARENCY REPORT

INTRODUCTION

Our purpose, *Reimagining Seafood to Nourish Life*, serves as the cultural foundation of our organization and guides our expectation of not only how High Liner Foods Incorporated conducts business, but also how High Liner Foods' suppliers conduct business. This includes respecting internationally recognized human rights and ensuring that workers connected to our operations and supply chains are treated with dignity and respect.

This report ("Report") for the financial year ending January 3, 2026, pursuant to Section 11 of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the "Act"), describes the steps High Liner Foods has taken to prohibit forced labour and child labour in the Company's supply chain. Throughout this Report, "we", "our", "Company" and "High Liner Foods" refers to High Liner Foods Incorporated.

OUR STRUCTURE, ACTIVITIES AND SUPPLY CHAINS

High Liner Foods was founded over 125 years ago and has become a leading North American processor and marketer of value-added frozen seafood. Our branded products are sold throughout the United States and Canada under the *High Liner*, *Fisher Boy*, *Mirabel*, *Sea Cuisine*, *Mrs. Paul's*, *Van de Kamp's*, *Catch of the Day*, *Icelandic Seafood*, and *FPI* labels, as well as private-label brands, to retailers, restaurants and institutions in North America. We own and operate three food-processing plants located in Lunenburg, Nova Scotia, Portsmouth, New Hampshire, and Newport News, Virginia.

High Liner Foods manufactures and distributes frozen seafood from our three North American manufacturing facilities, and our supply chain stretches across the globe with suppliers in Asia, Europe, South America and Africa. That supply chain includes multiple species of seafood from around the world, other food ingredients, and packaging.

The Company's annual Sustainability Report, found [here](#), provides a broad overview of sustainability priorities, practices and performance across all our operations and activities.

OUR POLICIES & PROCEDURES

Code Of Conduct:

One of High Liner Foods' core values and guiding principles is operating its business responsibly, with a commitment to honest and ethical behavior, acting with integrity and compliance with all laws and regulations applicable to its business. This commitment, along with more detailed standards regarding fair and equitable treatment of employees and human rights, are reflected in



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High Liner Foods' Code of Conduct ("Code of Conduct") which applies to all of High Liner Foods operations, employees, officers and directors. Employees, officers and directors of High Liner Foods receive training on the Code of Conduct, are required to acknowledge it annually and comply with it at all times. The Code of Conduct provides an important top-down framework for High Liner Foods' ethical standards, including its approach to forced labour and child labour in supply chains, and is available on High Liner Foods' website [here](#).

Supplier Onboarding

High Liner Foods maintains a thorough due diligence and approval process for all new primary seafood suppliers and co-manufacturers. This process ensures our supply chain partners meet a broad set of requirements pertaining to labour practices, worker health and safety and other expectations detailed in the High Liner Foods Supplier Code of Conduct ("SCOC").

Supplier Code of Conduct

High Liner Foods expects its suppliers to conduct their business responsibly and protect the fundamental human rights and dignities of their workers, while recognizing cultural and regulatory differences around the world. The SCOC outlines the policies and procedures to which all High Liner Foods seafood suppliers are required to adhere to ensure their workers are treated in accordance with the principles established by the International Labour Organization and the United Nations Global Compact, among other standards as set out in the SCOC. The SCOC can be found on High Liner Foods' website [here](#) and contains the following key measures:

1. **Supplier Requirements:** The SCOC identifies core human rights and labour standards suppliers are expected to manage, including:
 - a. Forced Labour
 - b. Child Labour
 - c. Labour Hours
 - d. Freedom of Association
 - e. Discrimination
 - f. Harassment and Abuse
 - g. Health and Safety
 - h. Hiring and Employment Practices
2. **Audit Program:** Enforcement of the SCOC is primarily addressed through mandated third-party audits by accredited firms. Each supplier is required to arrange for audits of each of their sites by approved, accredited third-party audit firms or by a trained High Liner Foods employee. Additionally, seafood suppliers must allow for unannounced audits organized and funded by High Liner Foods at any site or time the Company deems necessary. Completed audits are required to be uploaded by the auditor to the Social Ethical Data Exchange (SEDEX) website.
3. **Violations:** The SCOC defines critical and other violations, including forced labour and child labour, and prescribes the actions and consequences if any such violations or



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suspected violations are discovered by High Liner Foods, including immediate termination of business relationships and other remedial requirements.

4. **Training and Development:** The SCOC affirms High Liner Foods' expectations regarding training and development programs for its suppliers.
5. **Whistleblower Program:** High Liner Foods maintains a robust Whistleblower Policy. The SCOC provides direction for safely and anonymously reporting violations of the SCOC without fears of reprisal. Reports received by the Company will be automatically directed to the Company's EVP, General Counsel & Corporate Secretary and Director of Internal Audit or, if marked sensitive, the Chair of the Audit Committee of the Company's Board of Directors and addressed in accordance with the Company's written policies and procedures concerning compliance reporting and enforcement.
6. **Annual Acknowledgement:** High Liner Foods' suppliers are required to acknowledge the SCOC annually by written signature.

In 2024, the Company launched a new unannounced audit program to strengthen compliance with the Company's SCOC. That program allows High Liner Foods to organize and fund unannounced [SMETA 4-Pillar](#) social compliance audits at any supplier site of the Company's choosing. The first two of these audits were completed in 2025 at supplier sites deemed to be "higher risk" in High Liner Foods' risk-based assessment process. Neither site was found to have major non-conformities or critical violations of the SCOC. This added enforcement mechanism strengthens our ability to identify and address risks of human rights abuses across High Liner Foods' supply chains.

Supplier Site Visits

High Liner Foods employees and agents in Asia and Europe conduct regular site visits at supplier facilities. In addition to reviews of production practices, these visits allow for the oversight of conditions related to worker wellbeing and safety. Worker interviews, tours of on-site dormitories, and engagement with site management may be conducted during site visits to identify potential risk indicators.

OUR RISK ASSESSMENT & REMEDIATION PROCESS

Risk Assessment

High Liner Foods recognizes the risk of forced labour and child labour is a complex global issue that is present in every industry, including those engaged by our operations and supply chains. As a responsible business, we have an active role to play in ensuring that human rights are protected, and that our employees, contractors, supply chain workers, and communities are treated with dignity and respect. High Liner Foods is continuously working to assess and address these risks within our operations to achieve responsible and transparent supply chains.

We assess the risk specific to each country in which High Liner Foods' suppliers operate by leveraging the United States Department of State (USDS) Trafficking in Persons Report (TIP Report). This annual report publishes the ranking of each country assigned by the USDS based on a country's actions and policies to identify and eliminate human rights abuses. We use the ranking of a country to dictate the frequency with which each High Liner Foods supplier must be audited, with suppliers in highest risk countries required to be audited annually. The audit frequency is defined in the Audit Program section of High Liner Foods' SCOC.

In 2025, we incorporated SEDEX's risk assessment tool to analyze site-specific risk. The tool scores supplier sites based on the country in which the sites operate and the sites' responses to self-assessment questionnaires. We combine the SEDEX risk assessment scores with the TIP report to understand the overall risk landscape of our supply chain and identify supplier sites to be potentially targeted by the Company's unannounced audit program.

Remediation

Any allegation or substantiated finding of forced labour, child labour, other human rights abuses within High Liner Foods' supply chain, or any violation of the High Liner Foods Supplier Code of Conduct (SCOC) by a supplier shall require High Liner Foods to take immediate action in accordance with the SCOC. Such action may include, based on the nature and severity of the breach, immediate termination or suspension of the business relationship, restrictions on future engagement, and the imposition of remedial measures, including mandatory independent third-party audits, documented evidence of corrective actions, and the development, implementation, and verification of comprehensive corrective action plans designed to achieve sustained compliance.

As we did not identify any instances of forced labour or child labour in our activities or supply chain in 2025, no remediation measures were needed, and no measures were taken to remediate loss of income to vulnerable families resulting from efforts to reduce forced and child labour.

OUR HUMAN RIGHTS DUE DILIGENCE TRAINING

High Liner Foods recognizes the importance of ensuring that employees who engage with supply partners are appropriately trained to identify and address risks related to labour practices and ethical conduct within the supply chain. The Sustainability, Procurement and Purchasing teams participate in periodic human rights due diligence training offered by SEDEX and other recognized organizations to support effective oversight of supply chain practices.

OUR PROGRAM EFFICACY

Since High Liner Foods' first SCOC was published in 2014, we have reviewed our SCOC and other applicable policies and procedures annually to ensure they align to the current best practices, including those prescribed by organizations including the United Nations and International Labour

Organization. This has resulted in multiple iterations of the SCOC, the latest version published in early 2026, in addition to regular refreshments of other applicable policies and procedures.

Additionally, the Company maintains quarterly social compliance committee meetings with key personnel to review and oversee updates to supplier lists and satisfaction of the conditions of our supplier approval process, including written confirmation of the SCOC and completion of required audits. The results of our supplier approval and audit processes are an important measure of the efficacy of our processes, and we track compliance with these processes which are reported annually in our Sustainability Report.

Aligning to globally recognized best practices does not provide certainty that human rights abuses do not exist in the High Liner Foods supply chain, and it is not possible to completely eliminate the risk of any such abuses occurring in our supply chain. High Liner Foods' suppliers are ultimately responsible for the treatment of their workers; however, we will continually assess the effectiveness of our policies and procedures related to labour practices, human rights and safety in our supply chains. Protecting the human rights of workers in our supply chain is critical to the responsible operation of our business, and we remain committed to identifying ways in which we can strengthen those protections and align suppliers to our expectations.

APPROVAL AND ATTESTATION

This Report was approved pursuant to subparagraph 11(4)(a) of the Act by the Board of Directors of High Liner Foods Incorporated.

In accordance with the requirements of the Act, and in particular Section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed below. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate, and complete in all material respects for the purposes of the Act, for the reporting year listed above.

I make the above attestation in my capacity as a Director and the President & Chief Executive Officer of High Liner Foods Incorporated for and on behalf of the Board of Directors of High Liner Foods Incorporated.

HIGH LINER FOODS INCORPORATED



Name: Paul Jewer

Title: President & CEO, Director

Date: May 20, 2026

"I have the authority to bind High Liner Foods Incorporated"

