VICIUNAI GROUP SUPPLIER'S CODE OF CONDUCT

Introduction

Viciunai Group is a manufacturer of surimi products, fish and seafood products, salads, and flour-based goods, with production facilities in Lithuania and other countries worldwide, as well as trading and logistics companies operating across Europe, North America and Canada.

As a significant participant in international business and society and in recognition of our responsibilities to customers, suppliers, employees, communities, and the environment, we are committed to upholding the principles of sustainable business practices and the United Nations Sustainable Development Goals throughout our entire supply chain.

To strengthen trust and reinforce our commitment to sustainable development throughout our value chain, including our suppliers and business partners, we require all suppliers to acknowledge and comply with the provisions of this Supplier Code of Conduct and to apply these standards within their own supply chains.

This Supplier Code of Conduct establishes mandatory requirements related to food safety, social responsibility, labour rights, environmental protection, and business ethics for all suppliers of the Viciunai Group.

The Code is based on the principles of the Amfori BSCI Code of Conduct and internationally recognized standards, including the UN Global Compact, ILO Conventions, UN Guiding Principles on Business and Human Rights, the UN Paris Agreement on Climate Change Mitigation, recognized good practices in food safety and quality, responsible fisheries management, and animal welfare standards.

Scope of Application

This Code of Conduct applies to Viciūnai Group suppliers depending on the nature of the supplied products and/or services:

No.	Supplied goods / services	Aplicable sections	Remarks
1	Food products: all	1, 2, 3, 6	
2	Food products: fish, surimi, seafood, products of animal origin	1, 2, 3, 4, 5, 6	Section 5 is mandatory for farmed fish, seafood, and animal-origin products
3	Services related to food production	1, 2, 3, 6	
4	Non-food products and services	2, 3, 6	

Implementation and Monitoring

By entering contractual obligations, the Supplier agrees to comply with this Code of Conduct and confirms its commitment to implement the provisions set forth herein and, upon request, to provide evidence demonstrating such implementation.

To verify and confirm compliance with the provisions of this Supplier Code of Conduct, the Supplier shall complete the self-assessment questionnaire provided to it (Form No. 56).

The Supplier undertakes to promote and require adherence to the same principles of this Code of Conduct within its own supply chain.

Viciunai Group reserves the right to conduct audits of the Supplier to verify compliance with this Code of Conduct and to require corrective action plans to address any identified non-compliance. In cases of material breaches, Viciunai Group may issue warnings, temporarily suspend deliveries, or terminate the business relationship.

1. FOOD SAFETY

1.1. General Requirements

Requirement	Confirms implementation:
Compliance with applicable legislation. Compliance with principles of good hygiene practice and requirements of GFSI recognized food safety standards' requirements throughout the supply chain	Developed and implemented Food Safety Policy
	Regularly reviewed HACCP programme and flow diagrams
	Quality and food safety management system certified according to a GFSI-recognised scheme or full implementation of GFSI requirements within the HACCP system
	Documented risk assessment of raw materials and production processes, including defined control measures
	Supplier and raw material approval, evaluation and monitoring system
	Raw material, packaging, and product specifications compliant with food safety and legal requirements, reviewed and updated at least every three years or upon change
	Shelf-life validation based on laboratory testing
	Allergen and cross-contamination management programme
	Product authenticity and food fraud prevention programme throughout the supply chain
	Product defence programme throughout the supply chain
	Supply chain traceability system
	Non-conformities identification and corrective action implementation system
	Complaint handling system
	Product recall programme and list of notification contacts
	Food safety culture implementation documentation
	All employees possess the appropriate qualifications and competencies to perform their assigned duties, are duly trained, and ensure compliance with applicable laws, food safety requirements, and internal policies
	Evidence of third-party GFSI audits or internal audits for non-certified suppliers

1.2. Hygiene practices

Requirement	Confirms implementation:
Ensure cleanliness and hygiene of premises, equipment, and vehicles. Carry out drinking water control, use clean ice. Implement pest control and waste management	Hygiene testing protocols for premises
	Cleaning and sanitation procedures and records
	Laboratory test results for products
	Drinking water test results
	Facility maintenance and repair programme and records
	Equipment maintenance programme and records
	Pest control programme and documentation
	Personnel hygiene requirements and infectious disease reporting procedures
	Hygiene inspection records
	Properly labelled Chemical Substances. Chemicals storage and usage procedures, safety data sheets, and control records

1.3. Storage Conditions

Requirement	Confirms implementation:
Ensuring appropriate storage conditions for raw materials and products throughout the supply chain	Temperature, humidity (where applicable) and storage hygiene records through the supply chain
	Inspection records of received raw materials

1.4. Traceability

Requirement	Confirms implementation:
Ensuring full traceability of raw materials and products throughout the supply chain	Product traceability and recall testing is performed at least once every 12 months throughout the supply chain from raw material to product and vice versa, with test results available upon request
	Traceability record kept in accordance with the requirements of legal acts and food safety standards, but not less than 12 months after the expiration date of the supplied raw material/product
	In 24 hours provide full traceability information, including but not limited to: origin, date of manufacture, batch identification, quantities etc.

1.5. Management of Biological, Chemical, and Physical Contamination Risks

Requirement	Confirms implementation:
Identification and effective management of biological hazards (e.g. parasites, bacteria, histamine), chemical hazards (e.g. biotoxins, pesticides, heavy metals), physical hazards (e.g. foreign bodies) risks	Documented biological, chemical and physical risk assessment
	Laboratory testing programme
	Monitoring and testing records
	Periodical risk assessment documentation
	Internal audit and inspection records
	Food fraud prevention documentation and laboratory testing results
	Foreign body prevention systems and control measures

1.6. Food Safety and Hygiene Training

Requirement	Confirms implementation:
Ensuring employee competence and regular food safety and hygiene training	Training needs analysis and training plans
	Training records and attendance logs are available
	Detailed training materials are adapted to processes and employee groups in a language understood by employees
	Knowledge assessment records
	Employee competency documentation

1.7. FIncident Management and Product Recall

Requirement	Confirms implementation:
Ensuring effective and timely incident management and product recall procedures	Implemented incidents management and product recall programme. Testing of system is carried out regularly
	Contractual obligations requiring notification of food safety incidents
	Sub-supplier agreements addressing food safety incident notification
	Timely notifications regarding food safety incidents, product recalls, certification scope restrictions, or regulatory actions, including corrective actions taken

2. HUMAN RIGHTS AND SOCIAL RESPONSIBILITY

2.1. Management System

The Supplier shall have a social responsibility management system that identifies and manages human rights and social welfare risks throughout the supply chain, implements corrective actions, monitors performance, documents result.

2.2. Employees Engagement and Protection

Requirement	Confirms implementation:
Ensure that employees are informed about their rights, working conditions, remuneration, and working and rest hours. Promote employee involvement in decision-making processes and foster open dialogue. Establish mechanisms that enable anonymous reporting of any violations and ensure confidentiality and protection against retaliation	Company's social responsibility policy includes statements on Employees Engagement and Protection
	Company's social responsibility policy communicated to employees
	Established employee communication and meeting systems
	Periodic employee training
	An effective grievance mechanism is in place for reporting and managing concerns related to working conditions, human rights violations, and complaints. Mechanisms are established to enable anonymous reporting of violations

2.3. Freedom of Association and Collective Bargaining

Requirement	Confirms implementation:
Respect the right of employees to form and join trade unions or other associations - or to refrain from doing so -and bargain collectively in free and democratic way	Company's social responsibility policy confirms freedom of association. Policy communicated to employees
	Employee representatives elected or employees informed of their rights to do so
	Meetings with employee representatives (when selected)
	No discrimination based on union/associations membership

2.4. Zero tolerance for discrimination, harassment, violence, or intimidation in the workplace

Requirement	Confirms implementation:
Zero tolerance for discrimination, harassment, violence, or intimidation in the workplace	Anti-discrimination statement in company policy. Policy communicated to employees
	Employee training programs. Training records
	Equal employment conditions for women and men
	Employment documentation provided in a language understood by employees
	Grievance mechanism implemented

2.5. Fair Remuneration

Requirement	Confirms implementation:
Ensure that employees receive wages no less than the legally mandated minimum and strive to provide remuneration that meets or exceeds the country's established living wage standards	Fair wage statement in company 's policy. Policy communicated to employees
	Remuneration determination procedures ensuring minimum wage compliance
	Timely wage payments
	A transparent remuneration system, ensuring equal pay for employees with the same qualifications performing the same work, regardless of gender, race, or place of residence.
	Living wage gap analysis
	Employees are informed about the paid remuneration system
	Only lawful deductions applied

2.6. Working Hours

Requirement	Confirms implementation:
Compliance with legal working hours; overtime is voluntary and compensated at a minimum of 125%; rest periods ensured. Employees shall not work more than 48 hours per week unless permitted by ILO exceptions	Fair wage statement in company 's policy. Policy communicated to employees
	Working time recording system implemented. System and records compliant with local legislation
	Evidence of voluntary, compensated overtime
	Evidence of at least one day off per week and entitlement to paid leave and public holidays
	Internal monitoring evidence

2.7. Occupational Health and Safety

Requirement	Confirms implementation:
Ensure safe and healthy working conditions	Safe and healthy working conditions in company's policy. Policy communicated to employees
	Evidence that national occupational safety and health legislation; international standards are followed, changes are implemented
	Recorded accidents and incidents. Recorded analyses and corrective actions. Evidence of assistance to the employee in case of an accident
	Periodic occupational health and safety training is provided to all employees, including hired staff, contractors, and other relevant personnel
	Workplace risk assessments are conducted at regular intervals, based on which measures are implemented to ensure safe and healthy working conditions
	Employees are provided with personal protective equipment (PPE)
	Internal monitoring evidence
	Established occupational health and safety committee
	Employees informed of their right to refuse unsafe work
	Periodic health checks records
	Ensured access to safe drinking water, rest areas, meal facilities where required and hygiene facilities
	If accommodation is provided to employees, it must be safe, comply with legal hygiene and living standards, and meet the essential needs of the employees

2.8. No Child Labour

Requirement	Confirms implementation:
Zero tolerance for child labour: No persons under the age of 15 may be employed, directly or indirectly, unless exceptions are permitted by the ILO	Child labour prohibition included in company policy. Policy communicated to employees
	Recruitment procedures including age verification
	Internal control and risk assessment are conducted
	Action plan for remediation if child labour is identified

2.9. Special Protection for Young Workers

Requirement	Confirms implementation:
Protection of young workers (under 18 years of age), Young workers shall not perform night work or hazardous tasks. If identified, work conditions must be immediately adjusted without reducing agreed remuneration	Protection of young workers - included in company policy. Policy communicated to employees
	Recruitment procedures including age verification
	Internal monitoring evidence

2.10. Secure Employment

Requirement	Confirms implementation:
Employment relationships shall be formalized through written agreements, avoiding the use of permanent fixed-term contracts whenever possible	Secure Employment statement included in company policy. Policy communicated to employees
	Personnel management procedure, contract conclusion procedure, conditions when fixed-term contracts are possible
	Employment relationships with employees are formalized through written employment contracts
	Internal monitoring evidence

2.11. No forced Labour or Human Trafficking

Requirement	Confirms implementation:
No form of forced labour or human trafficking is tolerated • Employees' identity documents shall not be retained without consent • Wages shall be paid without unlawful deductions • Any employee loans shall not be used as a means of coercion	Commitment to no forced Labour or Human Trafficking included in company policy. Policy communicated to employees
	Developed and implemented procedure, setting out provisions for employment practices, payment of remuneration, handling of personal documents
	Employee training done on regular basis
	Internal monitoring evidence

3. ENVIRONMENT AND CLIMATE CHANGE

The Supplier shall conduct its activities in compliance with environmental regulations, assessing environmental impact and risks, implementing measures to reduce negative environmental effects.

3.1. Pollution Prevention

Requirement	Confirms implementation:
Pollution prevention and reduction taking place by: • reducing water and energy consumption. • preventing water and air pollution • implementing waste reduction and recycling measures	Statement for pollution reduction and prevention included in companies' policy. Policy announced to employees
	System to ensure compliance with environmental legal requirements in place
	Waste sorting and reduction system functioning, waste reduction targets set
	Pollution control and reduction measures implemented, monitoring in place

3.2. Climate Change

Requirement	Confirms implementation:
Impact on Climate Change evaluated. Action to reduce Climate Change in place	Contribution to prevent climate change included in companies' policy. Policy announced to employees
	CO_2 emissions calculated within operations and value chain
	Reduce CO2 emissions by setting reduction targets

3.3. Deforestation Prevention and Supply Chain Traceability*

Requirement	Confirms implementation:
Agricultural and livestock products (including feed) must not originate from areas where deforestation or forest degradation occurred after **31 December 2020**	Has a system in place to ensure that the goods supplied are not linked to deforestation after 31 December 2020 and can provide evidence
	**For EUDR goods, the supplier can submit a due diligence declaration with geo-location coordinates, supply point information and other necessary data as required by the EUDR

** Applicable to all agricultural and animal-origin products*
*** Applicable upon entry into force of the EUDR*

4. RESPONSIBLE FISHERY

Requirement	Confirms implementation:
The fish was caught legally in accordance with science-based fish stock management measures (quotas, seasonal and territorial restrictions; legal and regulated fishing gear)	Fishing licences
	Quota (TAC – Total Allowable Catch) compliance reports, other evidence that the quantity of fish caught on board the vessels comply with the quotas and that the records are not falsified
	Catch Certificate– proof that IUU (Illegal, Unreported and Unregulated fishing) is not being carried out
	Evidence that by-catch is being continuously and sustainably reduced, and that all fish caught comply with the applicable Minimum Conservation Reference Size (MCRS)
	Evidence that there is no trade in fish species included in national and/or international species protection lists (ICUN Red List, OSPAR List of Endangered Species and Habitats)
	Evidence of dolphin-friendly tuna fishing*
	MSC Certificate**

**Applicable for tuna fishing*
***Additional evidence to be agreed separately*

5. ANIMAL WELFARE (for farmed fish, seafood, and meat)

Requirement	Confirms implementation:
Animal (fish) housing, feeding, stocking density, transport and slaughter practices are science based and applied in a way that minimizes stress, pain and suffering	Valid permits and registration for aquaculture/livestock activities
	Company's official statement/policy on animal welfare
	Evidence that a system has been implemented to ensure animal welfare during rearing, transport and slaughter. This includes ensuring: • the animals' basic needs (food, water, rest) • keeping conditions, cleanliness, lighting) are appropriate • stress and suffering are avoided • can behave naturally (move, communicate, express species-specific)
	Employees are trained on animal welfare
	Evidence that prohibited chemicals, hormones are not used
	Evidence that antibiotics are used only as directed by a veterinarian
	Evidence that measures to prevent fish escape into the natural environment are planned and implemented
	ASC; KAT, GLOBALG.A.P. and other certificates**

**Applicable for tuna fishing*
***Additional evidence to be agreed separately*

6. TRANSPARENCY AND BUSINESS ETHICS

The Supplier undertakes to ensure ethical business relations with suppliers and customers, to promote transparency.

Requirement	Confirms implementation:
Ensure ethical business relationships with suppliers and customers through the supply chain: • Bribery, corruption, and unfair behaviour are prohibited • The company and/or its management / shareholders and/or ultimate beneficiaries are not subject to international sanctions • Materials and products are not sourced from or linked to countries to which internal sanctions are applied	Business ethics policy developed and communicated to employees
	Business risk assessment is being carried out
	A system has been implemented to assess the reliability of business partners and their compliance with sanctions and other international restrictions.
	A personal data management procedure is in place to ensure the protection of information and personal data.
	Periodic business ethics training is conducted
	An Information Security Policy has been developed and implemented to protect information from potential data loss, deletion, unauthorized disclosure, and cyber incidents.
	A gift-giving and receiving policy has been documented and implemented
	An anonymous business ethics reporting system developed and is functioning.
	Internal control of business ethics is carried out