

Devi Sea Foods - Feed Division

Eff. Date: 05-11-2024

Policy and Commitment on Deforestation and Conversion-Free Supply Chains

● Introduction

Devi Seafoods Ltd., a premier Indian enterprise specializing in sustainable shrimp farming and processing, recognizes that long-term business viability hinges on integrating environmental stewardship and social accountability into every aspect of our operations and partnerships. In pursuit of elevating our aquaculture feed supply chain to meet the rigorous Aquaculture Stewardship Council (ASC) Feed Standard, we have formulated this policy to guide responsible sourcing practices that safeguard forests and natural ecosystems.

This document serves as a framework for Devi Seafoods Ltd. and our collaborators to proactively manage ecological risks, promote biodiversity conservation, and ensure alignment with ASC principles for plant-based ingredient procurement.

● Purpose

Our overarching goal is to foster a resilient and ethical supply chain by procuring plant-derived materials exclusively from sources verified as free from deforestation and ecosystem conversion. This policy underscores our dedication to minimizing habitat destruction, supporting climate resilience in aquaculture, and complying with ASC requirements, thereby contributing to the global push for sustainable food systems.

● Scope

This policy extends to all operations of Devi Seafoods Ltd., including facilities pursuing or maintaining ASC certification for aquatic feed production. It also binds our suppliers and business partners who provide plant-based ingredients, such as soybean derivatives, grains, and other commodities used in shrimp feed formulation.

● Key Commitments and Guidelines

To uphold the integrity of our supply chains and ASC compliance, Devi Seafoods Ltd. establishes the following unique commitments and operational guidelines:

Sourcing Integrity: We pledge to source all plant-based ingredients from supply chains certified as deforestation-free and conversion-free, with no land use changes occurring after the cut-off date of August 31, 2020, in line with ASC Feed Standard timelines. This includes prioritizing materials from regions with robust forest protection measures.

Supply Chain Vigilance: Implement comprehensive due diligence processes, including regular audits and traceability mapping, to verify that every plant ingredient originates from compliant sources. This involves leveraging digital tools for real-time monitoring and collaborating with third-party verifiers to address potential vulnerabilities in high-risk areas like tropical soy-producing zones.

Partner Accountability: All plant material suppliers must furnish verifiable documentation, such as sustainable certifications for Soy (e.g., RTRS, ProTerra), satellite imagery analysis from www.globalforestwatch.com or declaration letter confirming DC-free status from other plant ingredient suppliers (eg., Wheat, Maize, Rice & any other plant based materials) . We encourage partners to adopt similar policies and provide support through capacity-building initiatives tailored to the Indian aquaculture context.

Ongoing Evaluation and Response: Conduct continuous performance reviews of suppliers via annual assessments and surprise inspections. In cases of detected non-compliance post-cut-off date, we will:

- Collaborate urgently with the partner to halt activities, initiate restoration efforts, and develop a time-bound remediation strategy focused on reforestation and community involvement.
- Enforce suspension or permanent termination of contracts if corrective measures are not met, without liability for associated losses, while exploring alternative ethical sources.

Transparency and Reporting: Annually disclose progress metrics on DC-free sourcing, including percentages by ingredient category, origin breakdowns, and any incidents of non-conformance along with corrective action plans. Reports will be

made publicly available on our website and shared with ASC auditors to demonstrate accountability and drive industry-wide improvements.

Innovation and Collaboration: Invest in research for alternative low-impact plant proteins suitable for shrimp feeds, and engage in multi-stakeholder forums (e.g., ASC working groups or local sustainability alliances in India) to advance collective solutions for DC-free agriculture.

● Implementation and Oversight

Roles and Responsibilities: The DD/Sustainability team will oversee policy execution, with cross-functional teams handling procurement, compliance checks, and stakeholder engagement. Senior leadership will review adherence biannually.

Training and Resources: Provide mandatory training for employees and suppliers on DC-free principles, allocating dedicated budgets for certified material procurement costs and technological upgrades.

Review Mechanism: This policy will be revisited annually or in response to regulatory changes, incorporating feedback from audits, partners, and environmental experts to ensure it remains dynamic and effective.

● Conclusion

Through this policy, Devi Seafoods Ltd. reaffirms its role as a leader in sustainable seafood production, committed to preserving natural resources for future generations while meeting ASC benchmarks.