

Business Partner Code of Conduct

1 Purpose and commitment

At Trident Aqua Services (“**Trident**”), we conduct our business with a strong commitment to ethics, integrity and compliance. Our values of **Fish Welfare, Integrity and Commitment** guide how we operate and how we expect our business partners to operate when working with us.

This Business Partner Code of Conduct (the “**Code**”) sets out Trident’s minimum expectations for ethical conduct, legal compliance and responsible business practices. It provides a clear framework for what Trident expects from its Business Partners and forms an integral part of Trident’s approach to sustainable and responsible business.

The standards in this Code are based on internationally recognized principles, including human rights, labor standards, environmental responsibility and business integrity.

2 Scope and Applicability

This Code applies to all suppliers, subcontractors, agents, consultants, intermediaries, and other business partners of Trident (collectively referred to as “**Business Partners**”).

Business Partners are required to:

- Comply with all applicable laws, regulations, industry standards, and the principles of this Code.
- Ensure that all legally required permits, licenses, approvals, and registrations are obtained and maintained.
- Cascade the requirements of this Code – or equivalent standards – to their own employees, officers, directors, representatives, and subcontractors involved in business with Trident.
- Bear any costs associated with meeting the requirements of this Code.

Adherence to this Code will be a key factor in the selection, evaluation, and continuation of business relationships with Trident. Under no circumstances should a Business Partner follow any order or request that would result in a breach of this Code.

Failure to comply with the Code – where such non-compliance is more than minor – may result in termination of the agreement and business relationship, in addition to any other rights or remedies available to Trident. If a Business Partner identifies a potential or actual breach of this Code, they are required to promptly notify Trident.

3 Let us Know

Business Partners, as well as Trident's employees, directors, and representatives, are required to report any actual or suspected violations of this Code. Business Partners must maintain adequate grievance mechanisms to allow concerns to be raised in good faith, and they must ensure that individuals can do so without fear of retaliation.

See the Whistleblowing guideline on our homepage for more information on how to make such report.

Website: www.trident.no

4 Human Rights, Working Conditions and Health & Safety

Trident supports and respects internationally recognized human rights and expects the same standards to be upheld by all Business Partners. Business Partners must ensure that their operations do not contribute to, or are otherwise complicit in, human rights abuses.

Business Partners shall not employ child labor. No person may be employed below the minimum legal working age, the age for completion of compulsory schooling, or fifteen (15) years of age, whichever is higher. Where local law permits the employment of young workers between fifteen (15) and eighteen (18) years of age, such workers must not be engaged in hazardous, unsafe or physically demanding work.

Any form of modern slavery or exploitation is strictly prohibited. This includes forced, bonded or compulsory labor, human trafficking, and practices such as restricting freedom of movement, confiscating identity documents, imposing excessive recruitment fees, debt bondage, withholding wages, or the use of violence, threats or other forms of coercion or abuse.

Business Partners must provide employees with clear and written terms of employment and comply with applicable laws relating to working hours, rest periods, wages and benefits. Wages shall meet or exceed applicable legal requirements, collective agreements or prevailing industry standards and shall always be paid in full and on time.

Trident respects the rights of employees to organize, to form or join trade unions or other representative bodies, to engage in collective bargaining and to exercise their right of peaceful assembly in accordance with applicable law. Business Partners are expected to uphold these rights and to ensure that employees are not subject to harassment, discrimination or retaliation for exercising them.

Business Partners must provide a safe and healthy working environment, with appropriate systems in place to prevent work-related injuries and illnesses, and ensure that employees receive relevant training and protective equipment. Trident expects Business Partners to treat employees fairly and with respect, promote diversity and inclusion, and maintain a workplace free from discrimination or harassment.

4.1 Anti-bribery and Corruption

Trident has zero tolerance for bribery and corruption. Business Partners must not offer, promise, give, request or accept any improper advantage and must not seek business through illegal, unethical or improper means. Business Partners are expected to maintain appropriate controls, including a written anti-bribery and anti-corruption policy, to prevent such practices.

Gifts, meals or entertainment must never be offered if they could influence, or appear to influence, a business decision. Limited and lawful hospitality may be acceptable where it is

infrequent, of modest value, not provided in cash or cash equivalents, and consistent with customary and transparent business practice.

Particular caution shall be exercised in dealings with public officials, where even minor benefits may constitute a breach of applicable law.

4.2 Anti-money Laundering

Trident expects Business Partners to comply with applicable laws and regulations relating to anti-money laundering, counter-terrorist financing and other financial crime. Business Partners must not participate in, facilitate or support money laundering, terrorist financing or other illicit financial activities.

Business Partners shall maintain appropriate systems and controls to ensure that financial transactions are lawful, transparent and properly documented, and to identify and manage risks related to financial crime. Where relevant, Business Partners must cooperate with Trident in connection with due diligence, monitoring and reporting requirements.

4.3 Fair Competition and Antitrust

Trident expects Business Partners to conduct their business in full compliance with applicable competition and antitrust laws. Business Partners must compete independently, honestly and fairly, and must not engage in practices that unlawfully restrict or distort competition.

Anti-competitive conduct is strictly prohibited and includes, without limitation, bid rigging, price fixing, market or customer allocation, abuse of a dominant position and participation in cartels.

4.4 Sanctions and Trade Compliance

Trident expects Business Partners to comply fully with all applicable export control and trade sanctions laws and regulations, including those imposed by relevant international and national authorities.

Business Partners must not engage in business that would cause Trident to violate applicable sanctions or trade restrictions, including dealings with sanctioned persons, entities, vessels or jurisdictions, whether directly or indirectly, including through ownership or control structures, unless expressly permitted by law.

Business Partners must notify Trident without undue delay if they become subject to sanctions or become aware of circumstances that may affect compliance with sanctions or export control laws. Failure to comply with this section may result in suspension or termination of the business relationship.

4.5 Conflict of Interest

Business Partners must avoid situations that create, or may reasonably be perceived to create, a conflict of interest with Trident. Any financial, personal or other relationship that could improperly influence, or appear to influence, the Business Partner's decisions or actions in relation to Trident must be disclosed without undue delay.

4.6 Confidentiality

Business Partners must protect Trident's confidential information and intellectual property and may use such information solely for the purpose for which it is provided. All information accessed in connection with goods or services provided to Trident shall be treated as

confidential, whether or not marked as such, and safeguarded against unauthorized use, disclosure, loss or misuse.

4.7 Books and Records

Business Partners must maintain accurate, complete and transparent books and records in relation to their business with Trident. All transactions, expenses and payments shall be recorded in a timely and proper manner and supported by appropriate documentation, ensuring that records fairly reflect the underlying activities and transactions.

5 Sustainable Business Practices

Trident is committed to conducting its business in a responsible and sustainable manner and expects its Business Partners to do the same. Business Partners must comply with applicable environmental laws and regulations and apply a precautionary approach to environmental matters.

Where relevant, Business Partners are encouraged to promote environmental responsibility within their operations and to support the development and use of environmentally sound technologies and practices.

6 Compliance with Laws and Regulations

Business Partners are responsible for ensuring that their directors, officers, employees and any subcontractors, representatives or agents acting on their behalf comply with all applicable laws, regulations and relevant international standards in connection with their business relationship with Trident.

7 Reporting, investigations and consequences of breach

Trident monitors compliance with this Code as part of its ongoing supplier and business partner management. Compliance may be assessed through information received via reporting channels, due diligence processes or other appropriate means.

Business Partners are expected to address and remedy any actual or suspected breaches of this Code without undue delay. Where breaches are identified, Trident may require corrective actions, enhanced controls or other appropriate measures.

Business Partners must ensure that no individual is subject to retaliation, discrimination or adverse treatment for raising concerns or reporting suspected breaches of this Code in good faith.

Material or repeated breaches of this Code may result in consequences up to and including suspension or termination of the business relationship. Where a breach may constitute a violation of applicable law, Trident reserves the right to notify relevant authorities or cooperate with investigations by competent authorities.