

Code of Conduct

1 Purpose and Commitment

1.1 Why we have a Code of Conduct

At Trident Aqua Services (“**Trident**”), we place a strong emphasis on ethics, integrity and compliance. We want to be a good corporate citizen, and a strong and trusted partner to our shareholders, clients, employees and other stakeholders. Trident is strongly committed to upholding the highest ethical business standards and compliance with laws, rules and regulations.

Maintaining high ethical standards and upholding our shared values are a vital part of all of Trident’s operations and form the foundation on which our clients, employees, shareholders and other stakeholders base their confidence in Trident. These principles also play an important role in maintaining the strong value of the Trident brand and in promoting long-term sustainability and growth for our global business.

Trident’s Code of Conduct (the “**Code**”) is one of Trident’s key corporate policies and a guide to how we are expected to act, individually and collectively, in our daily work.

While the Code provides guidance on how we are to act in an ethical and compliant way, it is not possible to cover every situation that may arise in the day-to-day business of Trident’s global operations. Therefore, each employee and business partner have a responsibility to use his/her sound judgment and act in line with our values.

1.2 Our Code applies to everyone

Our employees must be guided by our core values: – **Fish Welfare, Integrity and Commitment** – be loyal, ethical and honest, have integrity and treat others with dignity, and respect and comply with our policies, applicable law, regulations and recognized conventions.

It is the responsibility of Trident as a company and all Trident employees, directors and officers to understand and comply with the Code. Trident also expects all its business partners – including joint venture partners, suppliers and sub-contractors – to abide by the principles of the Code.

Our managers have a responsibility to make sure that their teams are familiar with the Code and other policies. Each employee must also be aware of and follow the Code and all relevant policies and ask questions if something is unclear.

2 Let us know

If you find yourself in a situation that feels uncomfortable from an ethical point of view, or where you feel that Trident's values are at stake or compromised, you have a duty to make yourself heard. Receiving instructions from a more senior employee or manager does not change that.

If you, as an employee, director, officer or business partner want to report a violation of the Code, you should inform your manager and a representative from HR or Legal and Compliance. If you find it difficult to bring up an issue locally, if a reported matter is not resolved or if the allegation is of a serious or sensitive nature, it should be reported through our Whistleblowing Channel. See the Whistleblowing guideline on our homepage for more information on how to make such report.

Website: www.trident.no

All reports will be investigated. As far as reasonably and legally possible, the information provided by an employee will be treated confidentially, and no employee will be discriminated against for reporting, in good faith, what is believed to be possible violations of the Code. Employees who make such a report will receive feedback as appropriate.

There will be no reprisals or other negative consequences if you report in good faith. Anyone who retaliates against an employee for reporting a case of non-compliance in good faith will be subject to disciplinary action.

3 Our mission and values

Trident's mission as a company: **We drive industry excellence by providing sustainable and mission-critical services to the aquaculture industry.**

Our operations are based on three core values: **Fish Welfare, Integrity and Commitment**

- **Fish Welfare**

We prioritize the welfare of the fish in all our operations, from handling live fish to providing nourishing feed. We uphold the highest standards of care and maintain strict biosecurity measures. We understand that ensuring the fish's well-being at every stage, from early life to its final journey, plays a critical role in the success of our business and the sustainable production of high-quality protein.

- **Integrity**

We are dedicated to upholding our commitments, putting in the effort, and making ethical decisions. With a hands-on approach to problem-solving, we tackle challenges head-on. We hold ourselves accountable, treat others with respect, and refuse to compromise on quality or safety standards. Ultimately, our integrity is the foundation of being a reliable partner that delivers results you can trust.

- **Commitment**

Our commitment to our customers, our team, and the aquaculture industry know no bounds. We approach every challenge with passion, enthusiasm, and a caring attitude. We encourage everyone to bring new ideas to the table. We value motivation and involvement at all levels to find solutions that drive success for our customers. We are not just service providers; we are partners invested in the growth and prosperity of all stakeholders.

What does this mean for you?

You play an important part in ensuring we fulfill our mission together and operate according to our values.

4 Human rights

Respect for human rights is vital to Trident and how we conduct our daily business. Trident supports and respects the fundamental human rights set out in the United Nations Universal Declaration of Human Rights and the United Nations Guiding Principles on Business and Human Rights (including those expressed in the International Bill of Rights) and recognizes our responsibility to promote and observe those rights when conducting our global business.

Trident will take steps to avoid causing or contributing to adverse human rights impacts through its activities and address impacts when they occur. Trident will also seek to prevent or mitigate adverse human rights impacts that are directly linked to its operations or services. Where Trident has identified adverse human rights impacts resulting from or caused by its business activities, it is committed to provide for or cooperate in, their fair and equitable remediation.

What does this mean for you?

You must treat colleagues and others that you have contact with as a representative of Trident with respect and dignity.

5 Compliance with local law and regulations

Trident is a global company. All employees and business partners must always comply with the laws, rules and regulations of the countries in which we operate. The Code represents the base and is to be followed in all of Trident's operations, even if it is stricter than local legislation.

Local Trident entities may adopt and apply principles that are stricter or more detailed than those set out in the Code. If local rules are issued, they apply in addition to the Code.

What does this mean for you?

You always comply with all relevant laws, rules, regulations and policies.

6 Environment and animal welfare

Trident strives to conduct our business in a sustainable way with respect and consideration for the environment and animal welfare, and we should also work in a way that contributes to a more sustainable future.

We should continuously aim to reduce or minimize the impact of our business on the environment, at the same time as we must seek ways to improve the environmental performance of our operations.

We acknowledge our important role in the value chain and life cycle of the fish and are continuously working to build a bridge between good and efficient production on one side and good animal welfare on the other.

We must comply with or exceed environmental and animal welfare requirements set by applicable laws, regulations and international agreements.

What does this mean for you?

You are expected to contribute to reducing Trident's environmental impact by minimizing the use of resources, emissions, and waste, and by promoting improved environmental performance and high standards of animal welfare.

7 Employees and labor rights

Trident is a people company, and our people are our greatest assets.

Trident wants to be known for having employees who live Trident's mission and shared values and feel proud and passionate about Trident. Trident believes in diversity, and we aim to be a solid, trustworthy and stable employer, and promote relationships based on mutual respect and dignity.

We strongly believe in the connection between the competence of our employees and the result we achieve. We want to attract and retain people who share our values and can provide the best client service in the market. To achieve this, Trident strives to be an attractive employer that offers good working conditions, fair wages and opportunities for personal development. Managers at all levels have a particular responsibility to lead by example.

7.1 Terms of employment and compensation

Trident recognizes the importance of fair wages, reasonable working hours and benefits. Wages should be paid regularly and on time. Working hours and other employment terms should be in compliance with local laws and industry standards. Information on wages and benefits as well as other terms of employment are to be communicated clearly to each employee.

What does this mean for you?

You have the right to terms and conditions that are in compliance with local laws and industry standards. It is your responsibility to understand your own employment conditions and ask if something is unclear.

7.2 Freedom of association

Trident respects the rights of all employees to choose whether or not to be represented by a trade union for the purpose of collective bargaining and to form and join the trade union or workers' association of their choice in accordance with local laws and principles. This includes respecting the right to freedom of peaceful assembly and association. You should never risk being harassed or retaliated against for exercising these rights.

What does this mean for you?

It is your decision whether or not to be represented by a trade union or workers' association, or to form or join a trade union or workers' association.

7.3 Occupational health and safety

Trident recognizes the importance of providing a safe and healthy work environment and taking all reasonable steps to prevent accidents and injuries as well as supporting measures to promote health and well-being. Risk assessments should be carried out to identify and scope safety hazards, and employees should receive training, instructions and equipment in line with the assignment.

What does this mean for you?

You have the right to a safe work environment, and you have a responsibility to help create this. You must always comply with all local health and safety policies, rules and regulations. You should also report health and safety issues and risks to your manager or to the health and safety representative.

7.4 Alcohol and/or drug abuse

Trident has a zero-tolerance policy for alcohol and drug use while at work. All employees must be “fit for work” and free from any impairment caused by alcohol, drugs or other intoxicating substances. This applies both onshore and onboard our vessels and is essential to maintain a safe and responsible working environment.

What does this mean for you?

You must not use, be under the influence of, or possess alcohol or drugs while on duty or onboard. You must always be fit for duty and comply with Trident’s zero-tolerance requirements.

7.5 Diversity and equal opportunity

Trident is an equal opportunity employer, and all employees are to be treated and treat others fairly and equally, without any type of discrimination. We believe that diversity and inclusion form the foundation for innovation and creativity and that diverse teams contribute to our success and long-term sustainable growth.

Discrimination in hiring, compensation, training, promotion, termination or retirement based on race, ethnic or national origin, religion, gender, sexual orientation, marital or parental status, disability or other distinguishing characteristics protected by applicable law and regulations is never acceptable.

All employment decisions are to be made solely based on a person’s ability, experience, behavior, work performance and demonstrated potential in relation to the needs of the job.

What does this mean for you?

You should be able to work in an open and diverse environment, and you have a responsibility to contribute to a diverse workplace and to treat your colleagues with respect and dignity.

7.6 Harassment

All employees should be treated and treat one another with dignity and respect. Trident promotes a productive work environment and does not tolerate any form of intimidating behavior, harassment, bullying, abuse or retaliation, including sexual, verbal, physical or psychological harassment.

What does this mean for you?

You should be able to work in an environment where you feel respected and that is free from harassment. You must treat clients, colleagues and others that you have contact with as a representative of Trident with respect and dignity.

7.7 Child labor or forced labor

Trident does not employ or accept any form of child labor or forced or bonded labor.

What does this mean for you?

You must comply with local laws, regulations and license requirements concerning minimum age. You should never have to surrender your passport, identification documents or work permit as a condition for employment.

7.8 Social networking

Trident respects the individual's right to free speech and freedom to express one's opinion. However, only employees expressly designated to do so are authorized to make public statements on behalf of Trident. Employees and business partners who engage in activities in social media that show an association with or refer to Trident must behave in ways that are consistent with Trident's values and policies.

Confidential and sensitive information about Trident, our clients or client sites should never be disclosed.

What does this mean for you?

You have a right to express your opinion freely but must protect confidential or sensitive information about Trident and our clients. If you are active on social media, you should act according to Trident's values and policies.

8 Business ethics

Trident insists on honesty, integrity and fairness, and we are strongly committed to upholding and promoting the highest ethical business standards in all aspects of our business.

We practice good corporate citizenship and comply with laws and regulations in our countries of operation.

8.1 Fair competition and anti-trust

Trident believes in fair trade and honest competition, based on integrity, product quality, price and client service. While you as a representative of Trident may join associations in order to advance the industry, it is strictly prohibited to discuss or enter into agreements with competitors on pricing, market shares or similar illegal activities. We are firmly committed to respecting all applicable laws and regulations promoting fair competition.

What does this mean for you?

You must never discuss or agree with competitors on pricing, market shares or similar, and you must always follow all relevant laws and regulations regarding fair competition.

Learn more: *Fair Competition and Anti-trust Policy*

8.2 Bribery and corruption

Trident strives to offer the best possible services targeted to our clients' specific needs, and we expect to be selected as a service provider based on merit, in a free and fair competitive environment.

We believe that corruption undermines legitimate business, distorts competition and brings serious risk to our brand and our reputation.

Trident has zero tolerance for all forms of bribery and corruption, and we must never offer, solicit or receive bribes, other advantages, facilitation payments or other illegal payments to obtain or retain business. A bribe includes all financial or other advantages that are given, promised, offered, accepted, requested or received with the intention that a specific activity should be performed.

All business transactions must be lawful and carried out in the best interest of Trident. We must only do business with respectable business partners involved in lawful business activities and whose funds are derived from legitimate sources.

What does this mean for you?

You have a responsibility to understand and comply with Trident's policies regarding bribery and corruption. You must never offer, solicit or receive bribes, other advantages, facilitation payments or other illegal payments to obtain or retain business. Nor can you permit others to be involved in bribery or corruption on your behalf.

Learn more: *Anti-bribery and Anti-corruption Policy*

8.3 Entertainment, gifts, gratuities and donations

Trident should always be, and be perceived as, professional and independent in our interactions with our business partners. Purchasing and sales activities must be handled with the utmost integrity. Employees and business partners should not give or accept any gifts, gratuities or entertainment offers that could influence business transactions, or the employee's, business partner's or client's decision making. Gifts of minor value are sometimes part of local business culture and may be accepted as long as they are acceptable with regard to our values and policies and permitted according to local laws, rules and regulations.

What does this mean for you?

It is your responsibility to understand and comply with Trident's policies and guidelines regarding entertainment, gifts, gratuities and donations. It is also important that you are aware of the clients' policies regarding entertainment and gifts. You should never give or accept any gifts, gratuities or entertainment offers that could influence business transactions, or someone's decision making.

Learn more: *Anti-bribery and Anti-corruption Policy*

8.4 Third-party integrity, trade restrictions, sanctions and financial crime

Trident must not, under any circumstances, facilitate money laundering. We are committed to complying with all applicable national and international trade restrictions, including economic sanctions imposed on individuals, companies, or countries by jurisdictions where we operate.

Violations of international trade restrictions and/or sanctions can have serious consequences, including both personal and corporate criminal liability, with the risk of substantial fines and imprisonment.

To mitigate these risks, we screen counterparties against relevant sanctions lists and conduct risk-based integrity due diligence to help ensure that the background, reputation, and ethical standards of our business partners align with our own.

Employees must never, under any circumstances, violate or contribute to the violation of sanctions imposed by the UN, the EU, the US, the UK or any country in which we operate.

What does this mean for you?

You must ensure that your actions do not, under any circumstances, facilitate money laundering or contribute to the violation of trade restrictions and/or sanctions imposed by the UN, the US, the EU, or any country in which we operate

Learn more: *Integrity Due Diligence Policy* and *Trade and Sanctions Screening Policy*

8.5 Conflict of interest

Our business decisions must always be based on objective reasons and criteria and never be influenced by an employee's personal relationships or activities outside Trident or financial interests. Conflicts of interest can impact the decisions we make, harm our brand and reputation, and create mistrust within and outside the company.

A conflict of interest exists when an employee's private interests interfere in any way with the interests of Trident. A conflict situation can, for example, arise if you as an employee take actions or have interests that may make it difficult to perform your work objectively and efficiently.

Employees and business partners must avoid all conflicts of interest or perceived conflicts of interest between their personal activities and their part in the conduct of Trident's business. Business transactions between Trident and parties related to an employee, such as family members, relatives, friends, suppliers, clients or competitors, are only permitted under exceptional circumstances and after "grandparent approval", that is, by your manager's manager.

What does this mean for you?

You must make a strict separation between business decisions and personal interests. This includes not having any direct or indirect personal business connections (such as through a family member, relative or friend) with our clients, suppliers or competitors and only acting on Trident's behalf. If a situation arises that could lead to a conflict of interest, you must immediately disclose it to your manager or the legal department to get advice. Approval should be obtained according to the grandparent principle, that is, from your manager's manager.

8.6 Fraud

Fraud is when someone intentionally tries to mislead another person or entity or abuses his/her position to achieve a gain or an advantage for the employee or someone else – for example to unjustly receive money, services or assets. Fraud is a criminal offence in most countries.

Examples of fraud include falsifying or manipulating financial statements or accounts, intentionally misstating or omitting financial transactions, or stealing or using Trident's assets in an unauthorized manner.

What does this mean for you?

You must always act with honesty and integrity and be aware that all fraudulent activities are strictly forbidden.

8.7 Our suppliers

Trident works with many different suppliers to procure the goods, services and information that are necessary for our business. It is therefore important that we select the best suppliers for the job and treat them fairly. All suppliers and subcontractors are expected to meet Trident's ethical, quality and other standards and expectations and to follow all relevant laws, rules and regulations.

All kinds of compensation to or from business associates must be based on a verifiable supply of products and services only.

Suppliers must comply with *Trident Aqua Services' Supplier Code of Conduct*.

What does this mean for you?

If your work involves procurement or other supplier relations, you must make sure that our suppliers meet Trident's standards and expectations and follow all relevant laws and regulations and *Trident Aqua Services' Supplier Code of Conduct*.

You must ensure that we never pay for services or goods that we did or will not receive.

9 Business practices

9.1 Confidential information

Confidential information includes business secrets and other protected information. It also includes, for example, business plans, financial information and information about clients. The disclosure or loss of such information could damage our brand and lead to our stakeholders losing trust in us. Non-public information belonging to our clients or business partners that we gain access to through our business must also be protected, in accordance with all legal and contractual requirements.

What does this mean for you?

You are expected to exercise particular care to prevent any unauthorized use or disclosure of Trident's confidential or proprietary information.

9.2 Privacy and data protection

Trident respects the individual's right to privacy, and we are committed to handling personal data responsibly and in compliance with applicable privacy and data protection laws. We must also protect personal data in accordance with internal policies, instructions and contractual arrangements with clients.

What does this mean for you?

You are authorized to handle personal data only if this is required for your line of work. In that case, you must be familiar with and comply with relevant data privacy and data protection laws and policies.

10 Implementation and responsibility

It is the responsibility of each Trident employee, officer and director to read, understand and comply with the Code. You also have a responsibility to report suspected or known misconduct or non-compliance with the Code.

The Code must also be communicated and implemented, to the greatest extent possible, in all business partner relationships.

Regular training and communication will be provided to ensure all employees understand the Code and its importance to our overall success.

11 Reporting, investigations and consequences of breach

Trident monitors compliance with the Code on a regular basis, using information reported through the various channels available. Acts that are inconsistent with the Code must be corrected as soon as possible, and employees who violate the Code are subject to disciplinary action up to and including termination of employment.

Where a violation of the Code results in an offence punishable by law, Trident may notify the authorities of such violations.