



# **SERVICE SUPPLIER**

## **Expectation Manual**

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		Peter Perdakis	Renee Perry		

## Introduction

Quality Assurance and Food Safety are the cornerstones of Oddisea SuperFrozen business philosophy and the dedication to these principles guides us as we build our network of service suppliers of the world's best clean and natural sushi ingredients. At Oddisea SuperFrozen, we believe that our service suppliers for logistics, storage and distribution, and other services impacting quality and food safety are an integral part of our company. We hold our supply chain network in high regard and strive to build a strong relationship with our service suppliers.

This manual outlines the minimum set of quality programs that form the foundation of our food safety & quality systems along with our business code of conduct. We are committed to delivering safe and high-quality food products through the development, implementation, and maintenance of procedures that comply with our policies, applicable international, federal, state, and local laws and regulations, and Global Food Safety Initiative Standards (GFSI). We expect our suppliers to embrace these programs and cultivate a culture of continuous improvement in food safety and quality, exceeding our minimum expectations.

Where applicable, below table shows the mandatory list of the Service Suppliers Food Safety and Quality Requirements:

Compliance Expectation	Warehouse	Logistics
<a href="#">FDA Registration</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">GFSI Certified</a>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
<a href="#">Seafood HACCP (Fish and Fishery Hazards &amp; Critical Controls Points Guidance)</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<a href="#">FSMA Traceability Rule 204</a>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
<a href="#">FSMA Final Rule on Sanitary Transportation of Human and Animal Food</a>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

## Service Suppliers' Responsibilities/Expectations

When applicable, we expect our service suppliers to adhere to the following requirements:

- Compliance with all government regulations and company standards (e.g., GFSI, FDA, HACCP, Traceability)
- Submission of required documentation such as service supplier questionnaire, certifications, legal registrations, and food safety programs.
- Implementation of appropriate food safety and quality management systems
- Cooperation with our audits and inspections
- Prompt and effective communication with us regarding any quality or food safety issues that arise
- Segregation and safekeeping of non-conforming products to ensure secure storage and prevent the accidental release of implicated products.
- No significant changes to the hazard and risk management plan and records that accompany product documentation (e.g receiving tally, lot number recording) without written notice & agreement
- Provide all relevant documents within 20 business days

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## Details of Our Process

Our Service Supplier Approvals are conducted using 3iVerify. 3iVerify is a cloud-based food safety and quality management system which allows for a seamless, collaborative process between our food safety and quality teams. All questionnaires are issued through 3iVerify, and suppliers are required to respond and complete the questionnaire within 10 and 20 business days for GFSI-certified and non-GFSI certified service suppliers, respectively.



## Account Set-up

Suppliers will be established following this process:

1. Signed receipt and acknowledgment of this Service Supplier Expectation Manual and Code of Conduct
2. Service Supplier Approval questionnaire and document uploads completed in 3iVerify.

## Service Supplier Approval

All service suppliers must pass our supplier approval program. Vendors will be issued a service supplier approval questionnaire through 3iVerify and will be required to submit the following documentation:

Service Supplier Type	Certification Status	Documents Required
Cold Storage	GFSI	<ul style="list-style-type: none"><li>• GFSI certificate</li><li>• GFSI audit report</li><li>• HACCP Statement/ Letter of Guarantee</li><li>• FDA Registration</li><li>• Service Supplier Expectation Manual</li><li>• MSC Storage Plan / Segregation</li></ul>
	Non-GFSI	<ul style="list-style-type: none"><li>• Any non-GFSI scheme certification (e.g. ISO, HACCP)</li><li>• Third-party audit report (may it be from local government or external certifying body; in English)</li><li>• FDA Registration</li><li>• Pre-requisite Programs<ul style="list-style-type: none"><li>○ Temperature Monitoring Program</li><li>○ Product Recall, Traceability, and Withdrawal Program</li><li>○ Food Defense Program</li></ul></li><li>• Service Supplier Expectation Manual</li><li>• MSC Storage Plan / Segregation</li></ul>
Logistics	-	<ul style="list-style-type: none"><li>• FSMA Sanitary Rule of Transport Statement</li><li>• Service Supplier Expectation Manual</li></ul>

## Service Supplier Performance Monitoring and Review

Annual service supplier performance monitoring is a crucial aspect of our commitment to ensuring the highest quality standards and maintaining strong relationships with our suppliers. Each year, we conduct a comprehensive evaluation of our service suppliers to assess their performance and ensure alignment with our expectations. This evaluation includes factors such as complaints, results of inspection or testing (if applicable), customer rejections or feedback, satisfactory performance, impact to food quality, safety, and legality, regulatory actions, and audit reports. The purpose of this annual monitoring is so that we may jointly identify areas of strength, recognize outstanding performance, and address any opportunities for improvement.

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# Food Safety-related Requirements

## Temperature Control

Products requiring temperature control must have their operating limits specified. These limits should be adequately controlled, monitored, and recorded to ensure product safety and quality:

- Regular Frozen: 0°F (-18°C)
- Superfrozen: -76°F (-60°C)

## Special Handling Requirements

Products with special handling needs must be managed according to our agreed upon guidelines as specified in the Delivery Orders and other related email notifications. This includes any requirements for product security and the segregation of non-conforming products, if applicable. MSC-certified products must be physically separated from non-certified products during storage and transport to prevent any mixing.

## Vehicle Specifications

Vehicles used for transportation, including those in the load-carrying area, must be kept clean, well-maintained, and in good repair. This is to protect the products from any form of contamination. Where necessary, vehicles must be designed and constructed to allow for adequate cleaning and/or disinfection.

## Regular Maintenance

Conduct regular maintenance and cleanliness checks on all vehicles and storage facilities to ensure they meet the specified standards.

## Training

Ensure that all personnel involved in the handling, storage, and transportation of our products are adequately trained on the specific requirements outlined in this agreement.

## Reporting and Documentation

Maintain comprehensive records of all control measures, monitoring activities, and maintenance operations. These records must be made available to us upon request and retained until the end of the product shelf-life. The receiving tally sheet must be submitted to the Company within one business day of product receipt.

## Product Traceability

Ensure complete traceability of products throughout the receiving, storage, handling, and transportation processes. This includes maintaining detailed records of product movements, batch numbers, and any handling activities. Traceability records must be readily accessible and provided to us upon request to ensure a quick and effective response in the event of a product recall or investigation. Lot number recording in the receiving tally sheet must correspond with the packing list.

## Product Security

Implement robust security measures to prevent unauthorized access to products during storage and transportation. This includes secure storage facilities and transportation methods that safeguard against theft, tampering, or other security breaches.

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# Complaint Handling

Complaints are a normal part of business. While not every event represents an actual problem, each one is investigated thoroughly. The service supplier shall acknowledge receipt of complaint within 24 hours and must provide a complete report including root cause analysis, Corrective Action, and Preventive Action within 7 business days of receiving the complaint. Preventive actions will be discussed, and a comprehensive response must be submitted and agreed upon to close each issue.

Effective communication is vital throughout this process. We expect service suppliers to be transparent and responsive to our inquiries and provide regular updates on the status of the investigation and any corrective action being taken. We believe that open communication is the key to resolving issues quickly and maintaining a positive relationship between our companies.

# Out-of-Specification Products

In the event that a product is deemed out of specification while it is within the responsibility of the service supplier, Oddisea SuperFrozen expects its service suppliers to take full responsibility of the affected product. This includes providing credit for any products that became out of specification due to failures in control. Service suppliers should have procedures in place to investigate the root cause of the issue and implement corrective actions to prevent it from happening again. Oddisea SuperFrozen reserves the right to request additional testing or to reject any product that does not meet our specifications. We believe that working together with our service suppliers to ensure the highest food safe and quality products is essential to maintaining strong business relationships and meeting the expectations of our customers.

# Ongoing Compliance

As a service supplier, maintaining continuous compliance is crucial for the success of our partnership. To ensure compliance, we utilize a database called 3iVerify, which we require all suppliers to use. This database serves as a centralized location for service suppliers to manage and maintain all their compliance documentation. It also provides automated notifications for document expiration dates.

Service suppliers must upload and update all necessary compliance documents into 3iVerify as soon as they expire. A system-generated reminder email from 3iVerify will be sent upon expiry and every 7 days thereafter if the document remains un-updated. As applicable, these documents may include, but are not limited to:

- GFSI audit certificates (Annually)
- Complete audit reports in English (Annually)
- HACCP Letters of Guarantee (Annually)
- FDA Registration (Bi-annually)
- Storage procedures for MSC products



It is your responsibility to maintain ongoing compliance with the required documentation using 3iVerify. Failure to do so may result in delays in shipping and possibly the termination of the partnership

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## Business Code of Conduct

At Oddisea SuperFrozen, we are dedicated to conducting our business with the highest standards of integrity, transparency, and ethical behaviour. Our commitment to ethical conduct guides every aspect of our operations and interactions with employees, customers, suppliers, and stakeholders. The Oddisea SuperFrozen Business Code of Ethics outlines the principles and values that govern our conduct and serves as a foundation for building trust, respect, and accountability in all our endeavors.

To Conduct Fair and Appropriate Transactions and Business Activities The management team and employees of Oddisea SuperFrozen will, based on the Code of Business Ethics below, comply with relevant laws and regulations, international treaties, and rules effective within our Group with sincerity and high ethical standards to carry out fair and appropriate transactions and business activities with our business partners.

Our Business Partners include, but are not limited to, suppliers, service providers, research and development collaborators, and customers.

## Code of Business Ethics

### Protection of Human Rights

Oddisea SuperFrozen is committed to upholding and respecting human rights in all aspects of its operations. We recognize the inherent dignity and worth of every individual and strive to ensure fair and equitable treatment for all employees, suppliers, customers, and stakeholders.

- (1) We will respect the culture, customs and languages of all countries and regions in which we operate and seek to harmonize with the international society and local communities as much as reasonably possible.
- (2) We will not engage in any activity that will infringe on human rights, including child labor and forced labor. Furthermore, we will make efforts to work with our business partners and not associate with violations of human rights, and will not conduct business with companies and organizations that engage in such activities.
- (3) We will not engage in any form of harassment, discrimination or similar conduct that violates any applicable local law and not cause any trouble to other party(s).

### Compliance with Laws, Regulations, International Treaties and Internal Rules and Policies

Oddisea SuperFrozen adheres to all applicable international laws, regulations, and standards governing its business activities. We conduct our operations with integrity and transparency, ensuring full compliance with legal requirements in all jurisdictions where we operate.

- (1) We will observe and adhere to all relevant laws and regulations pertaining to the products and services we handle.
- (2) We will conduct business upon understanding and complying with international treaties and laws and regulations of pertinent countries on trade.
- (3) We will not engage in actions that damage the interest of our subcontractors without proper business or legal justification.

### Marketing and Sales Policy

Oddisea SuperFrozen maintains a marketing and sales policy that prioritizes honesty, accuracy, and fairness. We provide clear and truthful information about our products and services, avoiding deceptive or misleading practices that may misrepresent their quality or characteristics.

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- (1) We will always communicate with our business partners with a sense of ethics and carry out operating activities with sincerity.
- (2) We will not perform any act pursuing my own or a third party's interests contrary to the Company's legitimate interests or any act that may damage the trust or honor of the Company or cause any loss or damage to the Company.
- (3) Likewise, we will not perform any act that may damage the trust or honor our business partner(s) or cause any loss or damage to it/them.
- (4) We will work through understanding the needs and preferences of our customers, including consumers, to provide products and services needed from the market.
- (5) We will drive forward operating activities with the goal of generating mutual benefits with our business partners.

### **Ban on Unfair Practices**

Oddisea SuperFrozen prohibits unfair competition, deceptive advertising, price-fixing, and any other practices that may harm consumers, competitors, or the integrity of the market. We compete fairly and ethically, respecting the rights and interests of our competitors and promoting healthy competition in the industry.

- (1) We will work towards preventing unfair practices, which include the unjustifiable usage of company assets.
- (2) We will not engage in actions that cause conflict of interest. In the event it is recognized there is such possibility, we will take appropriate actions upon reporting to and consulting with our department responsible for governance.

### **Prevention of Corruption**

- (1) Whether in the US or abroad, we will not offer improper entertainment, cash, cash equivalent, gifts, benefits and other economic benefits to public employees or persons who are in equivalent positions.
- (2) With the exception of the Company's formal occasions, we will not offer cash, cash equivalent, gifts and entertainment to our business partners. Likewise, we will not accept gifts and entertainment from our business partners.

### **Handling of Information and Intellectual Properties**

- (1) Concerning information pertaining to our business partners, personal information, intellectual property of the Company and other confidential information, we will work to maintain appropriate management and prevent breach.
- (2) We will comply with laws and regulations of respective countries and regions concerning the use and protection of information and intellectual property.
- (3) Together with recognizing the significance of intellectual property rights and working to appropriately operate and maintain the Company's intellectual properties, we will not unjustly infringe upon nor use the intellectual properties of others.

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# Response to violations

## Our Policy on Responding to Violations

(1) Oddisea SuperFrozen is committed to promptly investigating and addressing any violations of our business code of ethics. We encourage employees and stakeholders to report any suspected violations through designated channels, and we take appropriate disciplinary action against individuals found to have violated our ethical standards.

Executives and employees who find actions that violate or may violate this Code of Conduct, or constitute unlawful or potentially unlawful activities are encouraged and requested, in accordance with the Company’s Rules on Whistleblower Policy, to report to or consult with his or her supervisor or manager, or through phone, a dedicated website or email using an internal or external point of contact, in an identifiable manner or anonymously the conduct observed or of which the employee has become aware.

(2) In the event a violation has been identified or the Company received a report described in the preceding paragraph, the Company will promptly, thoroughly and fairly investigate the facts.

(3) The supervisor or department responsible for governance who receives the reporting or consultation from the whistleblower will not disclose the name or other information of the whistleblower without his or her consent, and will protect the whistleblower from risking unfair treatment.

(4) In the event the investigation results confirm a violation, the Company will impose strict disciplinary measures on the violator in accordance with its Rules on Employment and other policies, as well as adopt measures to prevent reoccurrence.

## Personal Responsibility and Non-Retaliation Policy

(1) Every employee of Oddisea SuperFrozen is expected to uphold the principles and values outlined in this business code of ethics. We encourage personal accountability, integrity, and ethical decision-making in all aspects of work, and we strive to create a culture of trust, respect, and responsibility within our organization.

Each of the Company’s management team and employees confirms he or she is responsible for reporting with sincerity in the event a violation or unfair practice has been recognized as a fact, as well as when the likelihood of such actions has been detected.

(2) Each of the Company’s management team and employees will cooperate with sincerity when the Company will hold an investigation.

(3) The Company will hold a strict non-retaliation policy and prohibit retaliation on whistleblowers and cooperators of internal investigations.

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## Appendix

### Exhibit 1: Key Terms and Definitions

**Child Labor:** Work performed by a person who is under the minimum legal working age to be employed as determined by (i) a Business's or Supplier's policy (ii) the law of the jurisdiction in which the work will be performed, or (iii) the International Labor Organization Minimum Age Convention No. 138 - whichever indicates the higher minimum age requirement.

**Forced Labor:** Includes all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered themselves voluntarily<sup>1</sup>, encompassing traditional practices of forced labor as well as new forms of forced labor such as human trafficking<sup>2</sup>.

**Labor Trafficking:** The act of recruiting, harboring, transporting, providing, or obtaining a person for involuntary labor or services by means of force or physical threats, fraud or deception, or other forms of coercion.

**Service Supplier:** Organizations and individuals in Oddisea SuperFrozen's supply chain who contract directly with Oddisea SuperFrozen or a service provider of Oddisea SuperFrozen

**Supply Chain:** Any organizations or individuals involved in providing services to Oddisea SuperFrozen or producing, processing, or distributing Oddisea SuperFrozen's products from the product's point of origin to Oddisea SuperFrozen or point of sale, as applicable.

**Traceability:** The ability of each stakeholder in the supply chain who takes possession of the product to systematically identify a unit of production, track its location and associated sources (see KDE Table), and describe any treatments or transformations at all stages of production, processing, and distribution. This traceability must enable the product to be traced back to its original source(s) and comply with all applicable government regulations, such as the Seafood Import Monitoring Program (SIMP).

**Trafficking-related activities:** All activities that directly support or promote Labor Trafficking or Child Labor, including but not limited to:

- (i) using misleading or fraudulent recruitment practices during the recruitment of employees, such as failing to disclose basic information or making material misrepresentations regarding the key terms and conditions of employment, including wages and fringe benefits, the location of work, living conditions and housing (if employer-provided or employer-arranged), any significant costs to be charged to the employee, and, if applicable, the hazardous nature of the work;
- (ii) charging employees recruitment fees; and
- (iii) destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity documents, such as passports or drivers' licenses<sup>3</sup>.

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<sup>1</sup> International Labour Organization (ILO). Forced Labor Convention, 1930

[https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C029](https://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C029)

<sup>2</sup> ILO, General Survey on the fundamental Conventions concerning rights at work in light of the ILO Declaration on Social Justice for a Fair Globalization, Report of the Committee of Experts on the Application of Conventions and Recommendations, 2012, ILC.101/III/1B, para. 272.

<sup>3</sup> Trafficking-related activities refer to those actions, usually employed by labor brokers, to facilitate Labor Trafficking and Child Labor. These model policies use the definition contained in Executive Order 13627 issued by President Obama on September 25, 2012.

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Company Core Purpose

Purpose: “To Enrich Society Through Food”

What does this mean to Oddisea SuperFrozen?

We are inspired by the B Corporation movement and are currently on the journey to certification. Oddisea SuperFrozen believes in using our business as a force for good to protect our planet’s most valuable resources. We strive to achieve this through a relentless focus on a triple bottom line considering people, planet, and profit.

People

We want to impact people’s lives across the world in a positive way. We inspire our peers and competitors alike to adopt even higher standards in quality and food safety. We’re committed to the journey to become a Certified B Corporation.

Planet

We strive to have a positive impact on the planet by supporting the sustainability of the oceans and farms we work with, safeguarding the world’s natural resources for future generations. We aim to protect the environment and its biodiversity, our ecosystem, and the world.

Profit

We introduce North American consumers to authentic, unique, and high-quality ingredients from around the globe that are always natural and never manipulated. We are a mission before margin company, and while our imperative is to be profitable, it’s so we can continue our mission of enriching society through food.

Core Values

Excellence

We strive for excellence in all that we do by continuously raising the bar, challenging the status quo, and following a path of kaizen.

Accountability

To take responsibility for our actions that impact people and the planet. We inspire others to make decisions that positively impact all involved, from our team to our clients.

Trust

To do what’s right in all things, not because we have to, but because we want to. We are purpose-driven, considering people and the planet before profit in everything we do.

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