

Hy-Vee, Inc. Seafood Procurement Policy

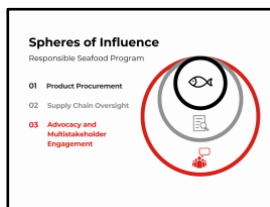
Responsible Seafood Principles

Hy-Vee is dedicated to providing customers with high-quality seafood that is safe for consumption and sourced responsibly to minimize environmental and social impacts. By employing its own U.S. Department of Commerce (USDC) lot inspector, Hy-Vee upholds its rigorous standards for seafood quality, safety, and integrity. To protect marine resources, support the communities that depend on them, and ensure the long-term availability of seafood, Hy-Vee is committed to selling responsibly sourced seafood, as defined in our Seafood Procurement Policy.



Responsible Choice Seafood

Responsible Choice Seafood is a key component of Hy-Vee's seafood program, recognizing products harvested in ways that support long-term sustainability. Products that meet these standards are eligible to carry the Responsible Choice logo. By choosing Responsible Choice seafood, customers contribute to protecting ocean resources and ensuring a healthy, reliable seafood supply for future generations.



Supply Chain Influence

Hy-Vee influences our seafood supply chains in three key areas. Our greatest impact is on the products we source for customers. Beyond sourcing, we leverage our buying power to improve supply chain practices and encourage suppliers to adopt industry best practices. At the broadest level, we collaborate with peers to use our collective influence in advocating for better fisheries management in source fisheries.



Supply Chain Due Diligence

Hy-Vee partners with **FishWise** to advance seafood sustainability through a seafood supply chain due diligence framework focused on reducing IUU fishing, protecting human rights, and improving environmental practices. We follow an iterative five-step approach - Embed, Collect and Assess, Engage, Act, Communicate - to guide continuous improvement, starting with public commitments and clear goals.

Responsible Seafood Commitments

Seafood Procurement

Our Seafood Procurement Policy establishes the environmental sourcing criteria required for our seafood supply chains. The policy applies to all fresh, frozen and sushi seafood sold at Hy-Vee seafood counters and in freezer aisles, Nori Sushi Bar items where seafood is the main

ingredient, and all Hy-Vee brand shelf-stable tuna products. A comprehensive outline of additional procurement requirements, including those related to policy compliance, data reporting, traceability, anti-IUU fishing, and social responsibility, is provided annually to seafood suppliers in our Seafood Supplier Expectations and Code of Conduct Letter (SSECoC).

Suppliers are required to meet all expectations outlined in the Policy and SSECoC.

Hy-Vee is also committed to:

- Maintaining 100% annual environmental policy compliance for all fresh, frozen, sushi, and private-label shelf-stable tuna offerings.
- By the end of 2027, we will transition all private-label farmed shrimp sourcing to meet higher certification standards, ensuring all private-label offerings utilize BAP 4-Star or ASC certifications.
- By the end of 2027, we will have assessed the feasibility of requiring private-label tuna suppliers to source exclusively from vessels that have 100% of trips monitored, either by electronic or human observers.

Supply Chain Oversight

Hy-Vee is dedicated to developing seafood supply chains that are responsible, traceable and transparent. Robust supply chain oversight helps verify that our suppliers treat their workers with respect and dignity, produce products in safe working conditions, and have legal and transparent harvesting and production processes. Hy-Vee is committed to:

- Annually reviewing and communicating expectations to our seafood suppliers; enhancing the quality and accuracy of supplier-provided data; assessing and mitigating the risk of IUU fishing; and improving working conditions within our seafood supply chains by implementing our due diligence framework.
- By the end of 2030, we will strengthen and expand our internal tuna vessel remediation plan and implementation guide to include all seafood products.
- By the end of 2030, relevant private label seafood suppliers will have committed to and are working toward implementing the **Employer Pays Principles** within their high-risk supply chains.

Advocacy and Multistakeholder Engagement

Being a leader in responsible seafood requires going beyond direct purchasing to actively engage with broader, industry-wide challenges. Hy-Vee has a strong history of supporting multistakeholder efforts and industry stakeholder committees to develop and improve legislation to address illegal fishing, fisheries management, regulatory governance, and human trafficking. Hy-Vee is committed to:

- Annually identifying¹, reviewing, and supporting multistakeholder, pre-competitive and individual company efforts to:
 - Strengthen regional fishery management organization (RFMO) management of tuna stocks, reduce bycatch for endangered, threatened, and protected (ETP)

¹ An additional topic of interest is support for the implementation of The Food and Agriculture Organization Agreement on Port State Measures (PSMA) to counter-IUU fishing legislation.

species, improve at-sea transshipment regulations, and protect fisheries observers at sea.

- Strengthen government regulation, implementation and enforcement of international standards to protect worker rights, including the Working in Fishing Convention (C188).
- Drive industry improvements and the standardization of practices, such as the transparent reporting of harvest vessels, to combat IUU fishing and promote the [ILO Decent Work Agenda](#).
- Establish or strengthen marine protected areas (MPAs) that aid the recovery of source fisheries when supported by the best available science.

Transparency

Hy-Vee is deeply committed to providing customers with high-quality seafood and maintaining transparency about where and how our seafood is sourced and produced. Hy-Vee complies with all state and federal regulations and includes this information at the point of sale. We go beyond compliance by actively sharing the successes of our Responsible Choice Seafood program with stakeholders through multiple platforms, including our [Responsible Choice Seafood](#) webpage, to highlight programmatic accomplishments. Hy-Vee is committed to:

- Developing responsible seafood program content, including progress toward our time-bound goals, for our Corporate Citizenship Report.
- Communicating programmatic accomplishments and progress toward time-bound goals using the Hy-Vee [Responsible Choice Seafood](#) webpage, Hy-Vee [Corporate Sustainability](#) webpage, and seafood industry news media, when appropriate.
- Communicating Responsible Choice Seafood program updates internally using Hy-Vee Huddle, an employee portal used to centralize and streamline company information.

Procurement Criteria for All Seafood

Prior to purchase, and in addition to meeting quality and assurance requirements, seafood suppliers and products undergo a thorough vetting process to ensure alignment with our responsible seafood program. Seafood products covered by this Policy must be sourced from fisheries or farms managed and harvested in sustainable ways as defined by the following standards and criteria:

- Sourced from certified fisheries or farms benchmarked to the [Global Seafood Sustainability Index](#) (GSSI) for the applicable species² or [Fair Trade](#) certified.
- Rated Green, Yellow or Certified by Monterey Bay Aquarium's [Seafood Watch](#) program.

²Sources that meet the Policy through Best Aquaculture Practices (BAP) certification must hold at least a BAP 2-Star rating, covering both the processor and the farm, excluding farmed salmon. Farmed salmon must be ASC or BAP-4 star certified to meet the Policy.

- Engaged in an improvement project making measurable and time-bound progress according to [FisheryProgress.org](https://fisheryprogress.org) (preferred) or another credible and public industry reporting platform.³

Hy-Vee only sources from seafood suppliers that adhere to the following requirements:

- Annually review and sign Hy-Vee's Seafood Supplier Expectations and Code of Conduct Letter (SSECoC).
- Report GDST-aligned key data elements (KDEs) to assess compliance with the environmental components of the policy.
- Ensure compliance with all U.S. import laws, including but not limited to the [Reasonable Care Guidelines for Forced Labor](#) and the [Uyghur Forced Labor Prevention Act](#).
- Agree to participate in collaborative supply chain analyses, as needed.

For shelf-stable tuna, Hy-Vee prioritizes partnerships with suppliers that:

- Are [International Seafood Sustainability Foundation](#) (ISSF) participating companies.
- Are members of the [International Pole & Line Foundation](#) (IPNLF).
- Have a public responsible purchasing policy and participate in initiatives to improve environmental, social responsibility, and traceability concerns.

Commodity-Specific Requirements and Special Conditions

Hy-Vee applies additional requirements to specific commodities and, under certain conditions, including the following:

- Responsible Choice Seafood Labeling Requirements - Seafood products that receive Hy-Vee's Responsible Choice logo have been sourced from fisheries or farms that meet one or more of the following standards: either certifications benchmarked by the GSSI for the applicable species (excluding BAP-certified farmed salmon), Fair Trade certified, or Monterey Bay Aquarium Seafood Watch Green, Yellow or Certified.
- Farmed salmon - Hy-Vee preferentially sources ASC-certified farmed salmon and will only use BAP 4-star sources if ASC-certified options are unavailable. BAP 4-star farmed salmon does not qualify for our Responsible Choice labeling program.
- Small-Scale or Unassessed Fisheries or Farms - While Hy-Vee's procurement criteria are comprehensive, some well-managed operations - such as certain small-scale, regional or Indigenous fisheries - may not fully meet these criteria but are still valuable and worth supporting. Hy-Vee will work with our sustainability partner FishWise to determine whether a source meets the intent of our responsible seafood program on a case-by-case basis. These items will not receive the Responsible Choice Seafood label.

³ Fishery improvement projects must be at "Stage 3 - Implementation" and have a progress rating of "C" or higher. Aquaculture improvement projects are less common and will be reviewed on a case-by-case basis in partnership with FishWise.

- Data Requirements for Highly Migratory Species - Upon request, suppliers of highly migratory species (e.g., tuna, mahi mahi, swordfish) must provide additional data, including vessel names, vessel identification numbers (such as IMO numbers), captain's statements and details of transshipment events.⁴
- At-Sea Transshipment of Tuna - At-sea transshipment – the transfer of fish, supplies or other cargo between vessels at sea – is a common practice in tuna fisheries that operate far from shore. In remote locations with minimal monitoring and oversight, workers are particularly vulnerable to human rights and labor abuses. We work with FishWise and our suppliers to identify and implement best practices and recommend the following to improve the transparency of at-sea transshipment:
 - **Monitoring and Oversight:** All transshipment events must be authorized by the relevant RFMO, appropriately recorded, and monitored⁵ by human or electronic observer(s).⁶
 - **Transparency:** Provide at-sea transshipment documents upon request, including post-activity declarations, supporting documentation referencing authorization to transship in RFMO waters, proof of monitoring, and proof of processes in place to protect workers.
 - **Worker Protections:** Require that all at-sea transshipment activities adhere to national and international regulations related to vessel and crew safety and worker protections, prioritizing those with the highest level of protection for workers.⁷ Protections include but are not limited to time spent at sea, vessel safety inspections, training and equipment for crew injuries, and protections for observers.

The Hy-Vee Seafood Supplier Expectations and Code of Conduct (SSECoC) letter provides comprehensive details on Hy-Vee's sourcing requirements for seafood suppliers.

⁴ A detailed list of required KDEs is annually communicated in the SSECoC.

⁵ Electronic monitoring on fishing vessels involves using various technologies to track, record, and manage fishing activities. Examples include, but are not limited to: VMS, AIS, electronic reporting systems such as digital logbooks, electronic monitoring cameras, satellite tracking, and RFID tags.

⁶ All vessels should report transshipment events to relevant regulatory authorities; all vessels authorized to transship have a unique vessel identification number (such as an IMO number); all transshipment vessels are flagged to, or are in cooperation with, a regional fisheries management organization (RFMO).

⁷ International frameworks and standards that should be used include the International Labour Organization [Work in Fishing Convention, 2007 \(C.188\)](#), the [International Maritime Organization Cape Town Agreement](#), and the [International Convention on Standards of Training, Certification and Watchkeeping for Fishing Vessel Personnel \(STCW-F\)](#).