



2019-2020
**Corporate
Responsibility
Report**



Mazzetta Company, LLC®

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Mazzetta Company is a family business at heart, which explains both our passion for the business and the pride we take in providing our customers with premium quality frozen seafood. Our family has been in the seafood business for over 40 years. We have worked hard to assemble a team of dedicated professionals to serve all of our customers – from mom-and-pop corner markets to the biggest retailers worldwide.


As we have said many times, Mazzetta Company is not just our business; it is our family name and our heritage. We are both humbled and extremely proud of the accomplishments we have made since our founding in 1987, but with success we have also been mindful of the great responsibilities we bear. For this reason, Mazzetta Company has long been a careful steward of our environment. We are a leader in employing best operating practices aimed at meeting our customers’ needs without compromising the ability of future generations to meet their own needs.

This idea has been embraced in the marketplace through terms like sustainability and corporate responsibility. Sustainability is a buzzword used frequently nowadays but few people can actually define what it means. As it applies to seafood, sustainability means taking a long-term view of how our actions affect future generations and making sure we do not deplete resources. At Mazzetta Company, business decisions that consider preserving our planet and its resources have always been a part of who we are.

Whether it is our involvement in international fisheries policy, marine conservation and ecosystem management, industry standards and certifications, or greater efficiency and mitigating impact throughout the distribution chain, you can be sure that Mazzetta Company is committed to being a global leader on sustainability. Although much is changing in the way seafood reaches the American dinner table, the principles and values that originally guided Mazzetta Company as a small family-owned business remain steadfast. We conduct business with integrity; a demonstrated commitment to excellence and to constant improvement; and strive to exhibit the highest level of professional, ethical, and social conduct. As a result, the Seamazz® brand name has grown to become synonymous with exceptionally high quality.

Tom Mazzetta
CEO and Founder
Mazzetta Company, LLC

CORPORATE PROFILE



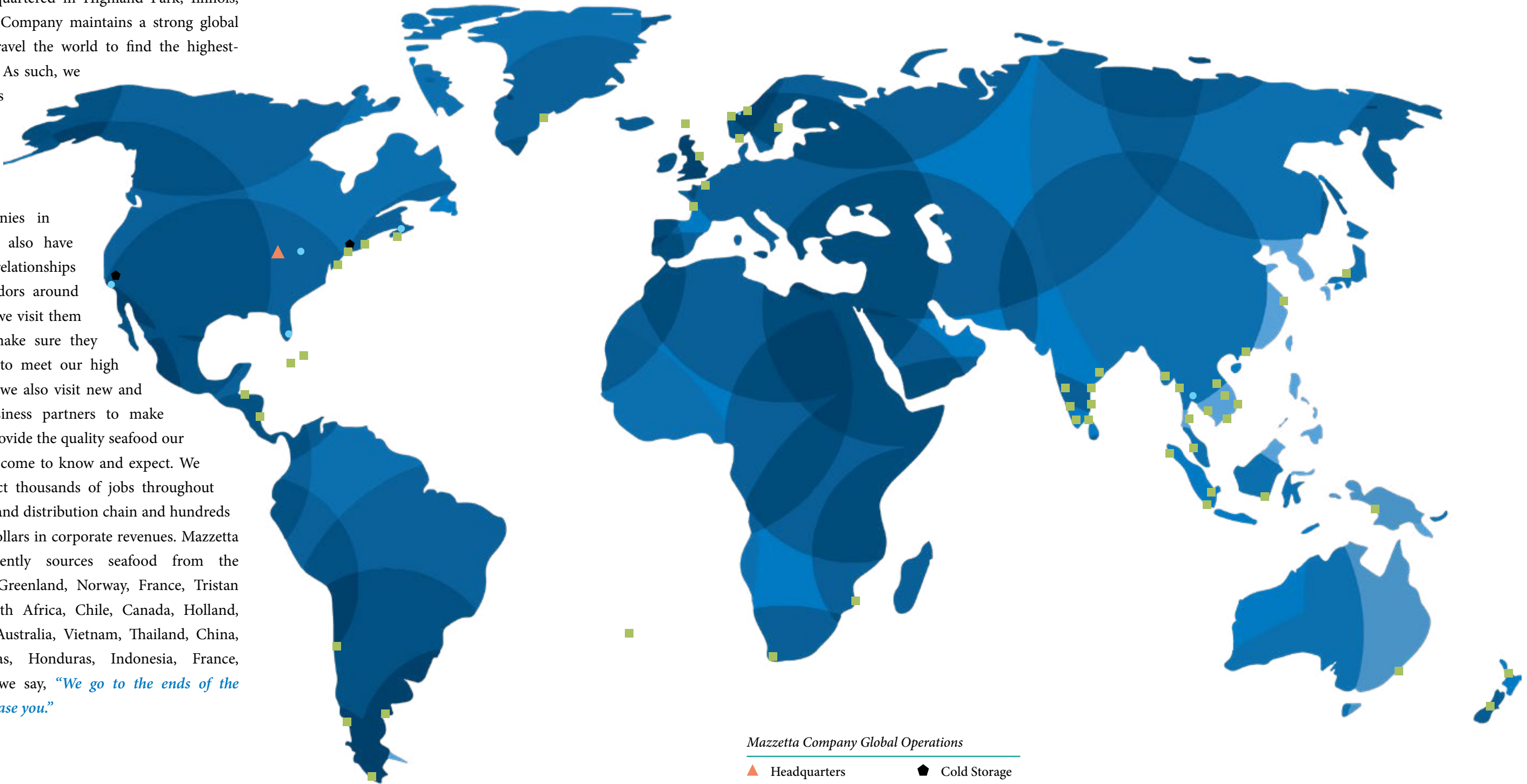
At Mazzetta Company, we understand that the seafood business is about much more than just seafood. It is about reliability, creative concepts, business and social responsibility, and most importantly, the ability to consistently deliver a quality product to our customers. Much of our success over the years can be attributed to our focus on one overriding mission - ensuring quality. We take great pride in employing a hands-on approach in the production of our products. From harvest and catch through processing, storage, transportation, and delivery, we are fully integrated in every step of the supply chain. It is our belief that by being closely involved in every step of production we are able to ensure the highest standards and controls and ultimately deliver to our customers a product of unparalleled quality.

Mazzetta Company was one of the first major importers of frozen seafood to institute a self-inspection program. It is our mission to exhibit the highest level of professional, ethical, and social conduct. We

employ a QA director, stationed in Bangkok, Thailand, to oversee our operations in Asia. His function is to perform random audits of the facilities and farms that supply our seafood to ensure that every plants' social and food safety conditions are of the highest quality.

Additionally, we operate two cold storage facilities close to our primary shipping ports. This lets us maintain an inventory that is second-to-none so we can offer the widest variety and best quality seafood in the industry. We also have an on-site quality control team at both warehouses to ensure our seafood meets rigid specifications for size, texture, taste, and moisture without over soaking or adulteration. Londonderry Freezer Warehouse, located in Londonderry, New Hampshire, completed a facility expansion. The warehouse now has an additional 77,000 square feet of freezer space, 11,700 pallet positions, and 10,000 square feet of office space. The facility also includes a new 5,000 square foot, state-of-the-art quality control test kitchen and product development facility.

Although headquartered in Highland Park, Illinois, USA, Mazzetta Company maintains a strong global presence. We travel the world to find the highest-quality seafood. As such, we are shareholders in Sanford Limited (New Zealand), one of the leading seafood companies in the world. We also have long-standing relationships with other vendors around the world, and we visit them frequently to make sure they are continuing to meet our high standards. And we also visit new and prospective business partners to make sure they can provide the quality seafood our customers have come to know and expect. We indirectly impact thousands of jobs throughout the production and distribution chain and hundreds of millions of dollars in corporate revenues. Mazzetta Company currently sources seafood from the United States, Greenland, Norway, France, Tristan da Cunha, South Africa, Chile, Canada, Holland, New Zealand, Australia, Vietnam, Thailand, China, Brazil, Bahamas, Honduras, Indonesia, France, and India. As we say, *“We go to the ends of the Earth just to please you.”*



Mazzetta Company Global Operations

- ▲ Headquarters
- Cold Storage
- Product Sourcing
- Satellite Offices

ATWOOD LOBSTER, LLC

Spruce Head, ME, U.S.A.

In 2011, we acquired Atwood Lobster Company, located on Spruce Head Island in mid-coast Maine. With a holding capacity of 350,000-lbs of live lobster in chilled, circulating water, Atwood Lobster provides us with direct access to freshly caught lobster. Having this wonderful asset allows us to further integrate ourselves into the Maine lobster industry, increase our volume and storage potential, and solidify our ability to assure supply, including live lobster, to our customers.

Since 1925, Atwood Lobster Company has been respected as a leader in the lobster industry. Our respect for fellow, family-owned and operated companies, and the rich history that they have created, has led us to retain the Atwood name. Our goal is to carry their proud tradition well into the future.

We have undertaken major construction to improve the facility; sales have quintupled; and, millions of pounds of lobster have flowed through the doors. It is our mission to provide customers with the best quality lobster, and it has paid off. Receiving positive feedback from shipments continues to motivate us to only get better.

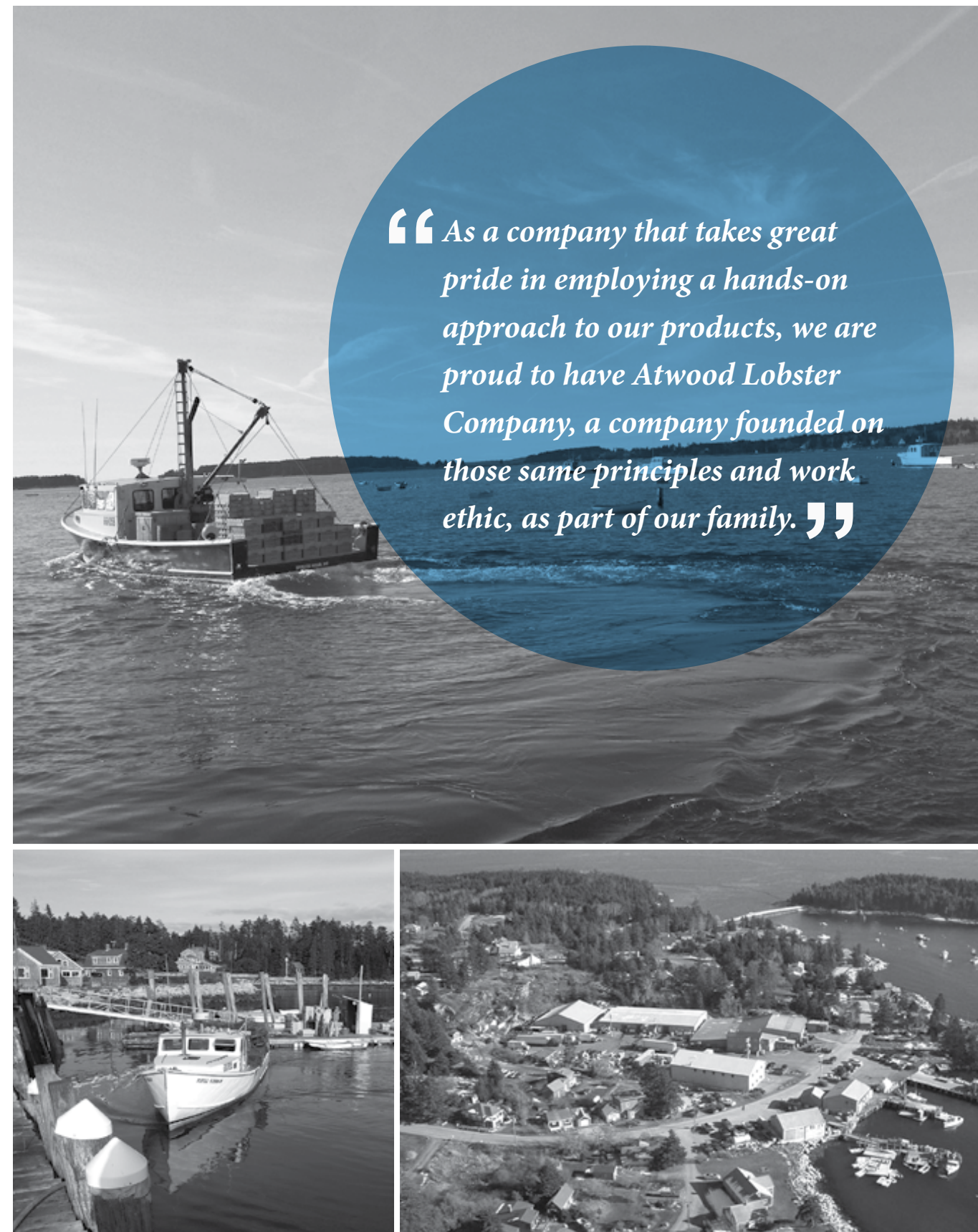
We have been involved in the Maine lobster fishery for nearly ten years. We view Atwood Lobster Company as a critical piece of our integration in the Maine lobster industry. The story of Atwood Lobster Company is not unlike that of Mazzetta Company; a family business that had the good fortune to grow into an industry leader, while still maintaining the principles and values that originally guided them as a small business. Although Bill Atwood has characterized the next phase of his life as his “chance to finally go fishing,” we expect to remain close with Bill and look forward to receiving his insights and counsel, which are unique to a third-generation lobster family.

We consider ourselves to be neither importers nor domestic producers. We are a seafood company involved in 20 countries around the globe. Our goal is to bring the best seafood on the planet to our customers. As such, we have aggressively and successfully marketed American lobster products to our customers, and our commitment to the Maine lobster fishery furthers that goal. We will continue to explore additional opportunities within Maine.

Visit www.atwoodlobster.com
for more information.



“As a company that takes great pride in employing a hands-on approach to our products, we are proud to have Atwood Lobster Company, a company founded on those same principles and work ethic, as part of our family.”



Atwood Lobster

BEACH POINT PROCESSING COMPANY

Prince Edward Island, Canada



Beach Point Processing Company, located on PEI, Canada, has been part of the Mazzetta family since 2010. The strategically central location in the Canadian Maritimes gives Beach Point access to a steady supply of lobster and snow crab. The collaboration between Atwood Lobster Company and Beach Point enables us to provide our customers with a vertically integrated source of lobster, lobster products, and snow crab. At the same time, we are able to work directly with our customers to explore unique in-store product development concepts.

The Beach Point facility has the capacity to process significant volumes of North Atlantic Lobster with a team of roughly 180 staff. They are developing programs that will further provide training and support the development of its work force. Additionally, Beach Point purchased two properties totaling more than six acres in Clark's Harbour, Nova Scotia that are critical

pieces to increase both Atwood Lobster Company's and Beach Point's capacity to process, store, and ship Seamazz® lobster and lobster products throughout the year.

This purchase is consistent with our overall strategy to further vertically integrate our lobster supply chain, diversify our product offerings, and assure live lobster supply 12-months a year. Strategic growth is essential in our ability to keep pace with our customers' demand for lobster products, and we will continue to pursue opportunities in Canada to further add key assets.

Increased capacity to store and ship lobster now enables Mazzetta Company to purchase and ship lobster from the coastal waters of Maine and Canada year-round. The Clark's Harbour acquisitions consist of two separate properties located on Cape Sable Island in the Gulf of Maine. The properties contain two main

buildings housing a storage facility with holding tanks and a warehouse.

In terms of sustainability, Beach Point is actively cultivating supply relationships with resource stakeholders including fishermen and fishermen cooperatives. These Canadian fisheries have a well-documented history of supporting sustainability initiatives and as Beach Point further develops its sustainability platform we intend to expand this discussion.

Visit www.beachpointprocessing.com for more information.



QUALITY CONTROL PROGRAMS

Mazzetta Company has throughout its history strived to maintain the highest level of ethical, business, and social standards. We have extremely high internal standards and know that it is part of our job to continually seek to improve what we do to meet our customers growing needs and expectations. We believe that being responsible in every aspect of our business decision-making not only helps us to produce the highest quality products, but also demonstrates to our customers our shared commitment to the products they bring to their family's dinner table.

“*Our on-the ground presence & our extremely high standards separate Mazzetta Company from our competitors.*”

Mazzetta Company's quality assurance program is comprised of three main pillars: third-party food safety audits, internal quality assurance audits, and third-party social audits. Our on-the-ground presence

and our extremely high standards, driven in large part by our layered audit processes, separate Mazzetta Company from our competitors.

Our commitment to food safety and quality assurance requires an extremely high-level of skill and attention to detail. We are very proud of the quality people we have secured to take on the important challenges inherent in this facet of our operations. A typical Mazzetta (internal) food safety audit would be conducted in line with federal requirements, general seafood industry standards, as well as Mazzetta-specific requirements. Many of the farms and facilities Mazzetta works with are regarded among the most modern and professionally managed seafood companies in the world. They incorporate state-of-the-art production procedures, comprehensive training and employee medical screening programs, and sophisticated recall and traceability monitoring procedures. In addition, their record keeping systems, HACCP programs, and approved vendor control programs are excellent, and their laboratory analytical capabilities and sanitation methods exceed industry standards.



Cooked White Shrimp, Peeled & Deveined, Tail-Off

FOOD SAFETY & SOCIAL AUDIT GOALS

Mazzetta Company has a short-term goal of significantly expanding the number of third-party social audits we perform each year. These audits ensure the absence of child labor, forced labor, human trafficking, harassment and abuse, unlawful working conditions, hours, wages and benefits, and guarantee worker's health and safety and freedom of association. As of 2017, nearly 100% of Mazzetta's vendors undergo third-party social audits. Our goal for the coming years is to achieve 100% cooperation.

“*As of 2017, nearly 100% of Mazzetta's vendors undergo 3rd party social audits.*”

As previously mentioned, Mazzetta Company sources products from 20 countries around the world. Based on this diversity, we feel strongly about the benefits of certified products. At a minimum, a certified product – be it BAP, MSC, ASC, or another – carries a measure of social, environmental, and food safety principles. Certification alone does not satisfy our requirements, but the benefits are such that we are striving to increase the percentage of certified products we offer.

As of 2015, 100% of Mazzetta Company's warm water shrimp were BAP certified. Achieving this goal has a lot to do with the internal high standards of Mazzetta Company, but it is also likely a reflection of the continued maturation of the shrimp aquaculture industry. In either case, it is our belief that by awarding our business to farms and plants that are committed to sustainability through high certification standards we reaffirm our own commitment to these important issues. In the long run, we see that as the right decision for the growth and viability of our industry and also essential to ensure that future generations have the same resources available to them that exist today.

FARM QC PROGRAMS

Factory QC staff conducts frequent inspections of farms and ponds throughout the year and records their findings. Feed ingredients, husbandry issues, use of unauthorized chemicals, and farm documents are reviewed by factory QC staff during these inspections. Mazzetta QC staff also conducts periodic inspection of company and contract farms during audit visits of suppliers.

Every lot of live raw material arriving at the factory is accompanied by a farmer guarantee letter. This letter states that no antibiotics were used during the grow-out period of the lot. Factory QC staff cross reference incoming live raw material to an “Approved Supplier” list to ensure that only approved raw materials are purchased. Factory owned ponds also provide an extra layer of security since all farm programs are managed and controlled by the factory. Farmer training is also recorded for factory owned ponds. Guarantee letters are included as part of the production document file and are reviewed during Mazzetta Company audits.

HACCP & THIRD-PARTY FOOD SAFETY AUDITING

All factories are required to have approved HACCP documents in place for all products produced. HACCP certificates are issued annually by each governmental control body and are kept on file in the factory Quality Assurance office for review. Critical Control Points are identified, including microbiological standards and identification of unapproved chemicals (antibiotics) in raw materials. Third-party audits comprising ACC, BRC, and other organizations that incorporate Global Food Safety standards are employed to identify risks and sources of contamination and adulteration of products. Complete HACCP documents are kept on file in the Mazzetta Company records management department for inspection by FDA.

“*Full traceability of finished product is tested at each supplier location.*”

MAZZETTA COMPANY FOOD SAFETY & QUALITY CONTROL AUDITS

Mazzetta Company conducts frequent food safety and quality control audits, inspections and visits to all suppliers throughout the year. Audit reports include full review of company in-house laboratory programs, third-party laboratory report review, production records review, approved source and farm inspection report review and full review of all quality assurance and quality control programs. Farm visits are often conducted during these Mazzetta Company audits. Full traceability of finished product is tested at each supplier location using a mock recall exercise conducted at least annually.

Our product specifications give instruction on how products are to be manufactured but also include microbiological parameters for finished raw and cooked products based on international and U.S. standards. Antibiotic analysis requirements are being added to our updated specification files but have always been included as post production requirements.

COUNTRY DEPARTMENT OF FISHERIES OR AGRICULTURE SAMPLING PROGRAMS

Every country has specific programs for sampling and testing of products prior to export. Samples of finished products are collected by government employees and sent to government laboratories for analysis prior to export. All countries test products for the following microbiological parameters: coliforms, E. coli, TPC, Salmonella, and Staphylococcus aureus. Some countries also require testing for Vibrio cholera, Vibrio parahaemolyticus, and Shigella. Additionally, we require that all cooked product be tested negative for Listeria monocytogenes.

Antibiotics are also tested in the governmental laboratories using both basic screening methods as well as more sophisticated techniques (liquid chromatography, mass spectrometry, ELISA, etc.). All countries test for the following antibiotics: chloramphenicol, nitrofurans (AOZ and AMOZ), and fluoroquinolones. Most countries will expand the testing and include AHS, SEM, specific fluoroquinolones (enrofloxacin, ciprofloxacin, and sarafloxacin), tetracyclines (OTC and CTC specifically), and malachite green. Mazzetta Company requires that these antibiotics be tested and found negative prior to shipment. All finished products are tested by governmental laboratories prior to export. Additionally, all suppliers are required to send samples of finished products to independent third-

party laboratories on a routine schedule for validation of in-house laboratory procedures.

Mazzetta Company has also instituted an additional third-party laboratory analysis of every lot at origin for some customers. This includes a separate, but identical, battery of microbial and antibiotic tests to validate both in-house and governmental laboratory findings prior to export. All products are held in storage at the factory sites until a negative report is issued and a clear health certificate is issued.

IN-HOUSE & THIRD-PARTY LABORATORY TESTING

All finished products are tested by governmental laboratories prior to export. Additionally, all suppliers are required to send samples of finished products to independent third-party laboratories on a routine schedule for validation of in-house laboratory procedures.

MAZZETTA QUALITY CONTROL AT DESTINATION

Mazzetta Company has also instituted an additional third-party laboratory analysis of every lot at origin for some customers. This includes a separate, but identical, battery of microbial/antibiotic tests to validate both in-house and governmental laboratory findings prior to export. All products are held in storage at the factory sites until a negative report is issued and a clear health certificate is issued.

FDA INSPECTION AT DESTINATION

The U.S. Food and Drug Administration conducts random selection of import products at port and tests for microbial contamination and unauthorized chemicals (antibiotics). If a shipment of product is determined positive at destination, the container is held and the factory is put on notice. All shipments from that factory are either held or returned.

Products arriving at either Highwood or Londonderry Cold Storage are inspected by Mazzetta QC Technical Department personnel for product specification compliance and food safety/hygiene conditions. Samples are taken and examined for workmanship issues, organoleptic analysis, and general specifications. Selected samples are taken randomly for laboratory analysis (microbiological, heavy metals, chemical, and antibiotic residue analysis). Every sample is photographed and logged into the QC product database to monitor each company's performance and for data analysis by Mazzetta QC staff.

Customer Analysis of Product – many of Mazzetta Company customers also conduct random selection of products for independent laboratory analysis for microbial contamination and antibiotic residual testing.

NEW ZEALAND

Case Study

RESPONSIBLE SOURCING

As we have stated many times, “Mazzetta Company is not just our business; it is our family name and our heritage.” Thus we care tremendously about the products that bear our brand name and the people that are involved, at every stage, in bringing them to market. We believe adamantly that our suppliers must strictly comply with local rules in regard to working hours, wages and benefits, health and safety, and forced labor. We verify compliance with our suppliers’ local laws through our third-party social audit process. All Mazzetta suppliers are required to undergo a third-party social audit unless specifically exempted.

In February 2012, Mazzetta Company was made aware of a news article chronicling human rights abuses aboard foreign-chartered fishing vessels that supply Sanford Limited of New Zealand, who is a supplier of Mazzetta Company. Our response was swift and outlined specific actions we would require of Sanford in order to continue our business relationship with them. At the same time, we worked with a large Canadian seafood importer and distributor, who is also a Sanford customer, to conduct a thorough third-party social audit. The audit targeted fishing vessels, crewing agents, and production facilities in order to gain insight on working conditions, payment, worker health and safety, and treatment of vessel crew. Although we were encouraged to learn that the audit results did not find evidence to substantiate claims of worker abuse or mistreatment aboard foreign-chartered vessels that supply Sanford, the audit did uncover issues with crew wage payments, record keeping, and oversight.

“*The audit targeted fishing vessels, crewing agents, and production facilities.*”

New Zealand’s Department of Labour and consulted with foreign crew to develop a system for payment of all foreign crew working in New Zealand waters. The new “Foreign Crew Management System” was implemented immediately to ensure all crew received their agreed wages in full and on time. Additionally, the role of offshore crewing agents was strictly limited to recruitment and these agents no longer have a role in the receipt or payment of crew wages.

Reporting requirements for on board vessel observers was strengthened to require formal reporting on crew welfare, treatment, and health/safety.

We were pleased to see the seriousness with which Sanford investigated this matter and the resulting policy changes based on those investigations and independent audits. The corrective actions and new management system Sanford put in place were all appropriate. We will maintain an open dialogue with Sanford to assure that their procedural changes are ongoing and achieving the desired outcomes.

In response to these findings, and the findings of their own internal investigations, Sanford made several policy changes. Specifically, Sanford worked with

The U.S. State Department has singled out the Thai shrimp industry as perpetuating trafficking and labor abuses in their annual Trafficking in Persons Report. Additionally, news reports have brought to light human rights and child labor abuses at shrimp production facilities and fishing vessels in Thailand. These stories focused on abuses aboard fishing vessels and in a network of unregistered “peeling sheds” that employ undocumented migrant workers from Burma to supply shrimp to large factories. We take these allegations extremely seriously. However, knowing all that we do as a company to ensure our supply chain is rid of labor abuses, we have consistently maintained that it is unproductive to condemn the entire Thai industry. Instead, we have advocated that those bringing allegations forward name specific companies involved in an effort to give responsible U.S. importers something tangible to act upon.

Nonetheless, allegations of illegal human trafficking and coerced labor continue to arise in connection with the Thai seafood industry. Thailand has been placed on a Tier 3 ranking of the Department of State’s Trafficking in Persons Report, in large part based on the abuses

alleged to have occurred in Thai fishing and seafood operations. A Tier 3 ranking is reserved for abusive traffickers and rogue nations.

“ *We do not tolerate labor abuses or modern day slavery in our supply chain.* ”

Because of the seriousness of this issue, Mazzetta Company has taken a lead on the *SHRIMP SUSTAINABLE SUPPLY CHAIN TASK FORCE*. In fact, Mazzetta is the only importer on the task force. We are working to develop an Audit Tool for auditing feed plants, fishmeal plants, and vessels; assisting the Thai Royal Government on their vessel monitoring system and helping them draft a port code of conduct model; and, we’ll be involved with a Fisheries Improvement Project for the Gulf of Thailand and Andaman Sea.

The Thai industry has taken several important steps to ensure any abuses stop, but the U.S. government seeks additional actions from the Thai government. The Royal Thai government has also begun to address

the issue, as evidenced by a recent trip to the U.S. by Theera Wongsamut, Thai Minister of Agriculture and Cooperatives.

From the beginning of our business endeavors in Thailand, all of our Thai partners were made well aware of our policies regarding workers’ rights and quality control. Our internal quality specifications require all overseas suppliers use only head-on shrimp from known sources with complete traceability back to the pond, and an explicit requirement that forbids the use of peeling sheds. We do not tolerate labor abuses or modern day slavery in our supply chain. Our products are as much about the people involved, and the means by which they reach the marketplace, as the products themselves. Our overseas suppliers know with great certainty that we do not purchase products from unregistered companies. We do not purchase products from companies who employ undocumented workers or child labor, and we do not purchase products without full traceability.

The U.S. State Department recognized Mazzetta Company for our leadership in the effort to rid global seafood supply chains of forced labor. Our commitment

in this regard is unwavering. We will continue to monitor this situation and offer our full support to governments, NGOs, and other industry leaders who are working to eradicate child labor, human trafficking, and forced labor from global supply chains.

SUSTAINABILITY

We maintain a proud commitment of including environmental consciousness in our business decisions and operating practices. As the next generation of the Mazzetta family begins to assume leadership roles in the family business, we have a vested and personal interest in making sure seafood is raised and caught in an environmentally responsible manner. Bringing sustainable products to the marketplace is just one aspect of our sustainability program. We also want to work with our suppliers to improve the sustainability of their manufacturing processes so our customers can continue to purchase from us with confidence.

Sustainability is a buzzword used frequently nowadays but few people can actually define what it means. As it applies to seafood, sustainability means taking a long-term view of how our actions affect future generations and making sure we do not deplete resources.

In 2014, employees from Mazzetta Company took part in the “*Ocean Trust Science and Sustainability Forum*.” The purpose of the event was to bring together leaders from the government, science, and business communities to discuss a scientific approach to promoting sustainability of our oceans. Attendees included Mazzetta Company, LLC, U.S. National Oceanic and Atmospheric Administration,

Canada Department of Fisheries and Oceans, Icelandic Ministry Fisheries, Norwegian Ministry of Fisheries, Mexico National Institute for Fisheries Biology, New Zealand Fisheries, Commission for the Conservation of Antarctic Marine Living Resources, UMass, Dartmouth, University of Washington School of Fisheries, Sea Grant, Food Marketing Institute, American Institute of Fisheries Research Biologists, and other major retail and restaurant seafood buyers.

At the forum, NOAA’s U.S. fisheries rebuilding plan was discussed in relation to species like orange roughy, farmed salmon, and Atlantic cod. NOAA’s annual report on the status of the nation’s fisheries documents its efforts to end overfishing and rebuild the nation’s fisheries. According to the report, 27 previously overfished stocks have been completely rebuilt and another 51 stocks are in the process of rebuilding. The implementation of annual catch limits in the U.S. was cited as a model to be duplicated in fisheries throughout the world. It is a science-based management process that prevents, monitors, and responds to overfishing. It is our belief that undertaking similar conservation efforts with our worldwide partners can realize the type of results that NOAA achieved.



“We work with our suppliers to improve the sustainability of their manufacturing process.””

MITIGATING OUR FOOTPRINT

For nearly two decades, Mazzetta Company has been a member and financial supporter of Ocean Trust. As an ocean conservation foundation, Ocean Trust is dedicated to building science, conservation, and industry partnerships for the sustainability of oceans.

Natural resources are essential to our business, from pond and ocean to storage and transport. We rely on healthy marine life and sustainable aquaculture for sourcing our products, and we depend upon energy and fuel efficiency to store and transport products for our customers. Ensuring those resources are used economically is not only good for our bottom-line, but also good for the future of the seafood business.

When selecting new vendors for sourcing seafood, we visit farms and factories to inspect their operations first-hand. Not only does this give us an opportunity to review their production to assure they can meet our quality and food safety standards, but it also allows us to see their physical footprint. We review their waste disposal and water discharge procedures, inspect the environment in and around the factory and pond, and confirm that they operate with as little negative environmental impact as possible.

With two cold storages at a capacity of more than 300,000 square feet of storage space, and a worldwide distribution network, Mazzetta's energy and fuel efficiency is one of the most significant ways we impact the environment. Incorporating modern technologies into how our freezers were constructed and how they operate is one of the primary ways we have been able to reduce energy usage while enhancing operational efficiency. Both freezers use the cutting-edge Sensatronics Environmental Management Solution (SEMS) to compare reported temperatures against thresholds. This automated system makes sure temperatures do not fluctuate and ensures cooling systems are running efficiently.

In addition to efficient energy usage, we work diligently to deliver products through an integrated and efficiently managed supply chain. We manage every step of the import process to make sure our products move swiftly, and we work directly with our transport partners to move products as smoothly as possible. We will seek out opportunities to work with our truckers to find ways to use modern technologies to save fuel and reduce emissions. Doing so will not only reduce our fuel costs but it is the right thing to do environmentally.

TOOTHFISH & CHILEAN SEA BASS

SUSTAINABLE PRODUCTS

Monterey Bay Aquarium's Seafood Watch program recently upgraded a number of toothfish fisheries as either 'Best Choice' or 'Good Alternative', up from its previous ratings of 'Avoid'. Seafood Watch is an independent, trusted source for consumers and businesses seeking information about environmentally responsible seafood choices. Stores and restaurants that once removed all toothfish from their shelves and menus are reintroducing toothfish products as they are now confident it is not contributing to problems of overfishing.

According to Dr. Tom Pickerell, Senior Science Manager at Seafood Watch, "While some may consider a recommendation to buy toothfish somewhat controversial, we are confident in our analyses and the industry has demonstrated that it is possible to harvest this species in a responsible manner."

Fifteen years ago, the seafood industry, conservation groups, and governments began major collaborative efforts to eliminate illegal, unregulated and unreported (IUU) toothfish fishing, to devise new methods to reduce seabird bycatch, and to ensure sustainable management of toothfish. There has since been a 95% decline in IUU catches of Patagonian toothfish.

Toothfish are sustainable, healthy, and delicious. Stores and restaurants can buy toothfish from Mazzetta Company with confidence as we require catch documentation and tracking to prove where the toothfish has come from.

For more information about toothfish sustainability, please visit the [Commission for the Conservation of Antarctic Marine Living Resources \(CCAMLR\)](http://www.ccamlr.org) at www.ccamlr.org and the [Coalition of Legal Toothfish Operators \(COLTO\)](http://www.colto.org) at www.colto.org.



Chilean Sea Bass Portion

LOBSTER

SUSTAINABLE PRODUCTS

Mazzetta Company is one of the largest suppliers of frozen lobster to the U.S. We source our warm water lobster from the Bahamas and Honduras; while our cold water lobsters are sourced from Maine, Australia, New Zealand, Canada, and Tristan da Cunha.

Warm water lobster fisheries are confronted with challenges as a result of differences in management standards amongst South American and Caribbean countries, and by recreational harvesting. To address these issues, Mazzetta Company relies upon our own internal standards and safeguards. As a baseline, we look to the NOAA/NMFS regulations governing Caribbean Spiny Lobster.

“*We source cold water lobster from the most successfully managed lobster fisheries in the world.*”

Daily catch limits, permit and vessel IDs, carapace size, and lobster tail requirements are the cornerstone

elements, but these management provisions also address release of undersized lobster, length of season, night diving, allowable gear, bycatch limits, trap identification, and protocols for berried lobster. Because the average growth rate of warm water lobster is 5 to 7 years before reaching minimum legal size, routine stock assessments and strong enforcement are essential to ensuring the sustainability of these fisheries.

Mazzetta sources cold water lobster from the most successfully managed lobster fisheries in the world. The Western Australian Lobster fishery was MSC certified in 2000 and then recertified in December 2006.

This year, we achieved one of our sustainability goals – MSC certification for all North Atlantic lobster and lobster products. Mazzetta’s sister companies, Atwood Lobster and Beach Point Processing, along with the fisheries who supply them, are now endorsed as fully traceable and sustainable by the Marine Stewardship Council (MSC). As a MSC certificate holder, every Maine and Canadian trapped lobster and lobster product sold by Mazzetta Company is eligible for the MSC eco label and all that it entails.



North Atlantic Lobster, Raw

Tristan da Cunha is a British Overseas Territory governed by an Administrator who is appointed by the UK Foreign and Commonwealth Office. In June 2011, MSC certified Tristan da Cunha rock lobster and the fishery is currently undergoing reassessment. The annual rock lobster quota is determined by the Tristan Fisheries Department under the auspices of the UK government based on best available scientific information and management advice provided by the Marine Resource Assessment and Management Group (MARAM) in South Africa as well as the Marine Resources & Assessment Group (MRAG) in the UK. Berried females may not be landed and all discarded lobster must be returned to the sea as close as possible to the place where caught. Stock assessments are independently carried out by MARAM with input from MRAG.

Although warm water and cold water fisheries are different in many ways, the common elements that must be sufficiently addressed to earn Mazzetta Company's business include:

- All landings, from commercial and recreational fishing, are accurately estimated and monitored.
- All commercial fishermen have provided a comprehensive record of catch by location, breeding state, by-catch, undersize returned, environmental conditions, gear, and bait-types used.
- The fishery's management system considers the long-term interests of people dependent on fishing for food and livelihood, in a manner consistent with ecological sustainability.
- A comprehensive research plan and monitoring program.

For more information on the sustainability of the lobster fisheries Mazzetta Company sources from, feel free to contact us directly, or visit:

www.msc.org

www.fishwatch.gov/

tristandc.com/government.php

www.lobster.um.maine.edu/

www.tastelobster.ca/eng_home.php

ORANGE ROUGHY

SUSTAINABLE PRODUCTS

Orange roughy is wild caught in deep waters off the coast of New Zealand. The New Zealand commercial fisheries are managed as part of the Quota Management System (QMS). This system is widely recognized internationally as one of the best for management of fisheries and the environment. Management of orange roughy fisheries has continually developed over the last 20-years as scientific understanding and knowledge has grown. Approximately half of New Zealand's total Orange Roughy catch comes from the East and South Chatham Rise Fisheries. East and South Chatham Rise are located to the east of New Zealand's South Island and form part of the ORH 3B Quota Management Area.

Under the Fisheries Act 1996, the NZ Minister of Fisheries (the Minister) has responsibility for setting the Total Allowable Catch (TAC) for each fish stock managed under the New Zealand Quota Management System. The TAC is fully allocated to commercial fishermen. The Ministry of Fisheries employs fisheries managers (responsible for advising the Minister on the appropriate level at which to set each TAC) and fisheries scientists (responsible for commissioning

the collection and analysis of scientific research to inform management advice). Fisheries managers work closely with scientists to ensure advice provided to the Minister is consistent with the best available scientific information.

Stock assessments are contracted by the Ministry of Fisheries and are undertaken by independent research providers. Results are presented to the Deepwater Fisheries Assessment Working Group (the Working Group) where they are peer reviewed. The Working Group is chaired by a Ministry of Fisheries scientist and membership includes independent scientists, fisheries managers, industry representatives, and environmental NGOs. Completed stock assessments are formally peer reviewed through a scientific plenary process culminating in a final report on the status of the stocks. An annual Plenary Report is freely available on the Ministry of Fisheries website (www.fish.govt.nz).

Catch-limit reductions have been implemented for orange roughy stock since 2008 to enable it to rebuild.

In 2012-2013, as part of the New Zealand's annual stock assessment and fishery management review process, an increase in the size of the orange roughy stock was identified. For the first time in 10-years there was an opportunity to increase the allowable catch of orange roughy. The fishing quota owners for this stock include New Zealand's largest deep water fishing companies, including Mazzetta partner, Sanford. Despite the increased quota, fishing companies did not fish the increased orange roughy stock in the interest of long-term sustainability.

As of January 2017, 60% of the total catch of New Zealand's orange roughy has achieved Marine Stewardship Council certification for sustainable fishing practices. Stores and restaurants that once removed orange roughy from their shelves and menus are reintroducing the versatile white fish as they are now confident it is moving toward sustainable levels of stock.



Orange Roughy Fillet

SWAI

SUSTAINABLE PRODUCTS

Mazzetta Company sources its Swai from Vietnam, which is included in the native range of the species. Swai (*Pangasius hypophthalmus*) has been confused with 'Basa', however this is a misnomer, as true Basa (*Pangasius bocourti*) is no longer farmed in large quantities in Vietnam. The FDA-approved market names for this species of fish (*Pangasius hypophthalmus*) are Tra, Swai, and Striped Pangasius. In our view, Swai offers advantages over Basa due to its faster growth rates, more efficient feed conversion rates, and the generally hardy nature of the fish.

In addition to the emphasis we place on processing, Mazzetta Company takes great pride in the effort it has undertaken over the past several years at the pond level to ensure the quality of our Swai. Likewise, we

work with suppliers that are Global G.A.P. and A.C.C.-Approved, as well as ponds that are SQF-certified. In addition, using only superior quality feed, closely managing stocking density, and employing both a comprehensive traceability and food safety regimen ensures Swai is sustainably raised and produced.

Swai Ponds: Our suppliers pump water directly from a fresh water source. Water quality is tested and water is treated prior to being introduced into the ponds. There is a 30% water exchange each day in the ponds in which new treated water is pumped. Ponds are drained after each farming cycle and cleaned before restocking. Ponds vary in size but the average 1 hectare pond will yield approx 200mt of fish. Farming cycle is 5-6 months from fingerling to harvest weight.



Swai Fillet

Swai Feed: National Fisheries Quality Assurance and Veterinary Directorate (NAFIQAVED) mandates under the Ministry of Fisheries of Vietnam that all farmers use palletized commercial feeds produced by approved suppliers. All feed is also third-party tested for the existence of residues or banned substances.

Swai Resource Size: In 2014, 1.255 million metric tons of Swai was harvested in Vietnam according to the Vietnamese Association of Seafood Exporters and Producers (VASEP). The incredible growth in volume has resulted in Swai becoming one of the most competitively priced white fish in today's market.

Food Safety/Traceability: Mazzetta Company has been at the forefront of food safety initiatives in Swai farming in Vietnam. We have been an active participant in the WWF Pangasius Aquaculture Dialogues and have implemented several 3rd party certifications for each step of the production process.

USDA The Food Safety and Inspection Service (FSIS) is the public health agency in the U.S. Department of Agriculture (USDA) responsible for ensuring that meat, poultry, and processed egg products are safe, wholesome, and accurately labeled. FSIS enforces the Federal inspection and regulation of meat, poultry, and processed egg products prepared for distribution in commerce for use as human food. Additionally, FSIS enforces the Humane Methods of Slaughter Act of 1958, which requires that livestock be handled and slaughtered humanely.

Through the 2008 and 2014 Farm Bills, FSIS now inspects Siluriformes, including catfish and Swai, under the Federal Meat Inspection Act. On December 2, 2015, FSIS published the final rule, "Mandatory Inspection of Fish of the Order Siluriformes and Products Derived From Such Fish", which establishes an inspection program for Siluriformes fish and fish products. Domestic and imported Siluriformes now must be inspected by FSIS at USDA approved "Import Houses" (i-house). Londonderry Freezer Warehouse has been granted status as an i-house and warehouse personnel are trained on all USDA importing and inspection procedures.

WARM WATER SHRIMP

SUSTAINABLE PRODUCTS

Over eighty percent of the shrimp Americans consume each year is farm-raised. In recent years, worldwide shrimp production has increased at a rate of nearly 10% annually resulting in a modern shrimp aquaculture industry in excess of \$10 billion annually with production numbers over 2.6 million metric tons. Numbers like those necessitate great responsibility throughout the production and distribution chain and Mazzetta Company has long embraced that responsibility.

As a Governing Member of the Global Aqua-culture Alliance, an Appointed Board Member of the National Fisheries Institute, and a registered Aquaculture Certification Council buyer, our commitment to best operating practices and high standards and protocols has never been in question. However, it is the additional overlay of our own internal requirements and protocols that separate Mazzetta Company from our competitors.

Warm Water Shrimp Farms and Feed: Mazzetta Company maintains strict guidelines regarding the use of feed. We require our suppliers to use feed ingredients that do not contain pesticides, chemical contaminants, microbial toxins, or other

adulterating substances. In addition, all of our suppliers are required to have approved farms from which they purchase. Farms must be inspected prior to harvest for the presence of antibiotics or banned substances, with inspection reports made available to our buyers when they visit suppliers. Additionally, our internal quality specifications require all overseas suppliers to use only head-on shrimp from known sources with complete traceability back to the pond, and an explicit requirement that forbids the use of peeling sheds. Our overseas suppliers know with great certainty that we do not purchase products from unregistered companies.

Warm Water Shrimp Transport and Processing: We demand strict specifications on hygiene and cleaning, water use, travel time from pond to plant, temperature limits, including cooking temperatures if applicable, product recall, and internal audits. We also boast industry-low use of tripolyphosphate and soaking times, excellent uniformity ratios, color segregation, and strong microbiological specifications. As you might imagine, Mazzetta Company is also extremely tough on allowable basic defects and foreign matter contamination. These specifications present significant costs, but in the end produce a superior product.

“All of our warm water shrimp is 100% Best Aquaculture Practices certified.”



Raw Black Tiger Shrimp, Peeled & Deveined, Tail-On

Warm Water Shrimp Environmental Mitigation:

With the phenomenal growth rate that shrimp aquaculture has experienced over the last decade, it is vitally important to continue increasing the awareness of proper waste management within the shrimp farming industry and enhance protection of coastal land and water resources. Production of waste is inherent in any farming activity from soybeans and corn to chicken and shrimp. We are adamant that our suppliers have systems of waste management for protecting land and water in the vicinity of both their farms and production facilities. These guidelines include maintaining canals and embankments to reduce erosion of above water portions, minimizing water exchange to the extent feasible, use of efficient fertilization and feeding practices to promote natural primary productivity while minimizing nutrient inputs, draining of ponds in a manner to minimize resuspension of sediment and prevent excessive water velocities in canals and at effluent outfalls, ensuring ponds are fallowed and disinfected between production cycles, having reforestation or similar programs, and of course routinely evaluating and improving waste management procedures. Mazzetta Company has also been an industry leader in requiring the replenishing of mangrove ecosystems to preserve the biodiversity of coastal ecosystems. Specifically, we strongly advocate that new shrimp farms are not to be developed within mangrove ecosystems. Realizing that some mangrove must be removed for canals when new shrimp farms are sited behind mangroves, a reforestation commitment of no net loss of mangroves is maintained.

For more information, please visit

<http://www.gaalliance.org/>

<http://www.aquaculturecertification.org/>

INDUSTRY LEADERSHIP

Mazzetta Company maintains a strong presence in Washington, D.C., within federal agencies, and on Capitol Hill. We believe firmly that to assume a leadership role in our industry we must have the ability to speak with our own voice where decisions are made on the most important policy issues of the day.

We expect the federal government to continue to look closely at the issues of import duties, country of origin, and labor and human rights issues abroad. In our view, these issues are critically important in terms of maintaining the integrity of our industry and its products, a level playing field for industry competitors, and also in terms of guarding against the potential for unintended consequences and interruption of supply. In this regard, Mazzetta Company works closely with our Congressional delegation, key committees of jurisdiction, and policy-makers within federal agencies to help them fully understand how proposed policy changes may work in application.

Changes in U.S. food safety policy have been well documented, and Mazzetta Company has been fully engaged in these policy discussions since they were first introduced. We have been fortunate that one of the leading voices in this discussion at the federal level is Senator Richard Durbin of Illinois. Having our senator at the heart of this policy debate positioned Mazzetta Company well in terms of having a platform.

In January 2011, the President signed the Food Safety Modernization Act (FSMA) into law. Since that time, we have been working with the federal government, our suppliers, our customers, and others in the industry on implementing the FSMA rules and regulations. FSMA went into effect on January 1, 2013. The seafood industry is ahead of the game because our Hazard Analysis and Critical Control Points (HACCP) requirements meet the Act's goal of being preventive rather than responsive, and now the other industries will have to catch-up.

FSMA covers product recall, traceability, importer registration, creation of an accredited FDA third-party audit and laboratory program, increased inspection, including overseas FDA offices, and import fees among other issues. As stated, Mazzetta Company believes firmly in high industry standards and federal safeguards to allow consumers to be confident that their food supply is the safest in the world.

AFFILIATIONS & WORKING GROUPS

Aquaculture Certification Council

Mazzetta Company is a registered buyer of ACC and thereby adheres to its Best Aquaculture Practices certification program.

<http://www.aquaculturecertification.org/>



Customs Trade Partnership Against Terrorism

Mazzetta Company was the first seafood company to participate in this vital program administered by the United States Customs and Border Protection Agency. C-TPAT is a voluntary government-business initiative to build cooperative relationships that strengthen and improve overall international supply chain and U.S. border security.

<http://www.cbp.gov/border-security/ports-entry/cargo-security/c-tpat-customs-trade-partnership-against-terrorism>



Global Aquaculture Alliance

In addition to sitting on the Board of Directors, Mazzetta Company is a Governing Member in GAA's mission to further environmentally responsible aquaculture while meeting global food demand.

<http://www.gaalliance.org/>



National Fisheries Institute (NFI)

Mazzetta Company sits on the Board of Directors and the Fisheries Scholarship Fund, and is a member of the Executive Committee, Importers Committee, Better Seafood Board, Shrimp Council, Pangasius Council, and Crab Council. In addition, we have had eight employee-graduates of NFI's Future Leaders Program.

<http://www.aboutseafood.com/>



Ocean Trust

Mazzetta Company is proud to be a Sea Sponsor, providing support to the building of science, conservation and industry partnerships for the sustainability of the oceans and providing a link to sustainable fisheries, wildlife and the environment.

<http://www.oceantrust.org/>

Ocean Trust

Coalition of Legal Toothfish Operators (COLTO)

Mazzetta Company is a proud member of COLTO. COLTO works with governments, industry, conservationists, and international management groups to combat illegal, unregulated, and unlicensed fishing with a specific recent focus on the southern Indian Ocean regions, around the Exclusive Economic Zones (EEZs) of France, South Africa, and Australia. COLTO members represent more than 50% of the total global legal production of Toothfish.

<http://www.colto.org>



CORPORATE GIVING

Unemployed and under-employed families often find it difficult to get high-quality protein as part of nutritional meals for themselves and their children. Food banks throughout the U.S. struggle to find enough proteins to feed those who depend upon them for meals. The myriad health benefits and varieties of seafood make it a great high-quality protein for food banks.

U.S.-based hunger-relief agency SeaShare is a non-profit organization that works within the seafood industry to combine donations of fish, services, and funds to generate large volumes for hunger-relief. America's seafood industry has enabled SeaShare to donate over 150 million seafood meals since 1994. This year, Mazzetta Company has donated over 1,000,000 servings of seafood to SeaShare.

SEASHARE




We go to the ends of the earth just to please you!



Mazzetta Company, LLC®

Importers of shrimp, lobster and finfish

We go to the ends of the earth just to please you!™

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