Wegmans Seafood Sourcing Policy 3.19.2025 Trust Wegmans to deliver the freshest seafood, responsibly sourced.

TRACEABILITY

- All suppliers and producers of seafood sold in the Wegmans Seafood Department will utilize a
 <u>Global Dialogue on Seafood Traceability (GDST)</u> interoperable traceability system of the supplier's
 choice.
- All seafood will be sourced from fisheries, farms, processors, and brokers that are compliant with the recordkeeping requirements of the U.S. FDA Food Traceability Final Rule (FSMA 204) by December 31, 2025.
- a) All <u>direct</u> suppliers to the Wegmans Seafood Department will establish and utilize an EDI transmission for data required by the <u>Wegmans Supply Chain</u> team (POs, ASNs, FSMA, invoicing information, etc.) by April 1, 2025.
 - b) FSMA 204 compliant data of <u>all</u> suppliers to the Wegmans Seafood Department will be available to Wegmans via query through a GDST-interoperable system by December 31, 2025.
- 4. Depending on source location, species, perceived risk, or other variables, Wegmans will require additional data elements derived from, but not limited to, the GDST framework.



GDST is not a benchmark or a certification, rather an agreed-upon set of KDEs and definitions that help ensure that products entering our seafood supply chain originate with legal production practices. The standards also help facilitate regulatory compliance with import controls such as the US Seafood Import Monitoring Program and the EU Illegal, Unreported, and Unregulated (IUU) fishing Regulation.

FRESHEST SEAFOOD

 All finished goods will be received from facilities that are certified as benchmarked to the standards of the <u>Global Food Safety Initiative (GFSI)</u>

<u>and</u>

 All ready-to-eat items will be transformed from raw to RTE at facilities that are certified as benchmarked to the standards of the GFSI.

<u>and</u>

3. Dependent on any species/source specific risks, Wegmans may require additional risk-mitigation including but not limited to additional training, onsite audits, incoming/outgoing QA oversight, sourcing and operational changes, or implementation of specific GFSI-benchmarked certification



GFSI does not provide food safety certification, rather they recognize several certification programs that meet the GFSI benchmarking requirements. Any GFSI-benchmarked standard has potential to satisfy clause 1 and 2 above. The current list of GFSI-recognized Certification Program Owners can be located on the GFSI website.

Freshness overwhelmingly moves in concert with stringent food safety practices, but Wegmans knows that many other factors contribute to the final experience our customers have with our seafood. We will endeavor to understand and improve all processes that add to or detract from our customer's experience of freshness including, but not limited to, harvest locations and methods, aggregation and holding practices, processing and handling, and transportation within the supply chain. Due to the global and disparate nature of seafood, Wegmans must consider these factors and apply the necessary governance/oversight on a case-by-case and source-by-source basis. The Seafood Merchandising office can provide species/source specific information.

RESPONSIBLY SOURCED (Environment)

 All seafood will be sourced from fisheries or farms that are certified as benchmarked to the standards of the Global Sustainable Seafood Initiative (GSSI)

<u>or</u>

At Wegmans discretion, seafood may be sourced from fisheries or farms that have utilized
alternative documented processes to verify alignment with and support of responsible practices
related to environmental impact.



GSSI does not provide environmental certification, rather they recognize several certification programs that meet the GSSI benchmarking requirements. Any GSSI-benchmarked standard will satisfy clause 1 above. The current list of GSSI-recognized certifications can be located on the GSSI website.

Sourcing our seafood in the most environmentally responsible way is a never-ending goal. Benchmarking provides in-depth foundational direction, but Wegmans will continue to request and/or require additional verified information beyond what benchmarking/certification may require. Examples include, but are not limited to, fishery improvement projects (FIPs), adhering to 3rd-party feed standards (esp. sustainable soy), NGO collaborations, additional scientific data, limitations on fishing areas. Due to the global and disparate nature of seafood, Wegmans must consider these factors and apply the necessary governance/oversight on a case-by-case and source-by-source basis. The Seafood Merchandising office can provide species/source specific information.

RESPONSIBLY SOURCED (Social)

- All seafood will be sourced from fisheries, farms, and processors that are certified as benchmarked to the standards of the <u>Sustainable Supply Chain Initiative (SSCI)</u>
 or
- 2. At Wegmans discretion, seafood may be sourced from fisheries, farms, or processors that have utilized alternative documented processes to verify alignment with/support of responsible practices related to social impact.



SSCI does not provide social certification, rather they recognize several certification programs that meet the SSCI benchmarking requirements. Any SSCI-benchmarked standard will satisfy clause 1 above. The current list of SSCI-recognized certifications can be located on the SSCI website.

Sourcing seafood in the most socially responsible manner is often more challenging to verify and document than the more developed expectations around environmental issues. Benchmarking provides in-depth foundational direction, but it is relatively underdeveloped and very few certifications are represented. It is essential to understand the impacts that we have through the entirety of our supply chain and Wegmans will likely request and/or require additional verified information beyond what benchmarking or certification may require. Examples include but are not limited to 3rd-party social audits, benchmarked ESG reports, verifications of payments, NGO collaborations, academic studies. Wegmans Seafood requires, at a minimum, supplier-partner commitment to:

Universal Declaration of Human Rights

ILO Declaration on Fundamental Principles and Rights at Work
UN Guiding Principles on Business and Human Rights

FAO Guidelines for Small-Scale Fisheries
OECD Guidelines for Multinational Enterprises
Collection of Core ILO Conventions

Due to the global and disparate nature of seafood, Wegmans must consider these factors and apply the necessary governance/oversight on a case-by-case and source-by-source basis. The Seafood Merchandising office can provide species/source specific information.