



# MarinTrust Chain of Custody (CoC) Standard V2

## CoC Factory Audit Template Report

**CONFIDENTIAL MATERIAL**  
(For authorised use only)

| Company Details                                                                  |                                                                                       |                   |
|----------------------------------------------------------------------------------|---------------------------------------------------------------------------------------|-------------------|
| Site-Code : CoC119                                                               |                                                                                       |                   |
| Company Name : TRIO S.p.A.                                                       |                                                                                       |                   |
| Site Name : TRIO S.A.                                                            |                                                                                       |                   |
| Address : 1117 Esquina Blanca avenue, Santiago city                              |                                                                                       |                   |
| Country : Chile                                                                  | Postcode : Not available                                                              |                   |
| Telephone : 56977870819                                                          | Fax : Not available                                                                   |                   |
| Company Representative Name : Ms. Sonia Arancibia                                | Email : Sonia.Arancibia@fiordoaustral.com                                             |                   |
| Site Representative Name : Ms. Karen Espina                                      | Email : Karen.Espina@fiordoaustral.com                                                |                   |
| Audit/Auditor Details                                                            |                                                                                       |                   |
| Auditor Names (Title/ Name/ Surname):<br>Mr. Cristobal Flores                    | Is this a remote audit?                                                               | No                |
| Audit Type :                                                                     | Surveillance 2                                                                        | Other – specify : |
| Audit Start Date : March 25 <sup>th</sup> , 2024                                 | Previous Audit Date (if applicable) : May 17 <sup>th</sup> , 2023                     |                   |
| Audit Start Time : 9 am                                                          | Duration of Audit (hh:mm) : 4 hours                                                   |                   |
| Issue Date of Current Certificate (If applicable)<br>Oct 04 <sup>th</sup> , 2021 | Expiry Date of Current Certificate (If applicable) :<br>April 09 <sup>th</sup> , 2024 |                   |
| Site address (site being audited <sup>1</sup> )                                  |                                                                                       |                   |
| Site name : TRIO S.p.A.                                                          |                                                                                       |                   |

<sup>1</sup> In case of a multi-site certificate, record here the address details of the site where the management system is based

|                                                            |                                 |
|------------------------------------------------------------|---------------------------------|
| <b>Address :</b> 1117 Esquina Blanca avenue, Santiago city |                                 |
| <b>Country :</b> Chile                                     | <b>Postcode :</b> Not available |

## General information

| Key Personnel                                                                                         |                                  |      |                      |                 |                  |                 |
|-------------------------------------------------------------------------------------------------------|----------------------------------|------|----------------------|-----------------|------------------|-----------------|
| Attendee (Name, Surname)                                                                              | Role / Organisation              | Site | Present at Audit (x) |                 |                  |                 |
|                                                                                                       |                                  |      | Opening Meeting      | Site Inspection | Procedure Review | Closing Meeting |
| Sonia Arancibia                                                                                       | Quality assurance deputy manager | TRIO | X                    | X               | X                | X               |
| Karen Espina                                                                                          | Quality chief                    | TRIO | X                    | X               | X                | X               |
| Other                                                                                                 |                                  |      |                      |                 |                  |                 |
| Are there other CoC certified companies registered at the same address? (if yes note the CoC codes) : |                                  | No   |                      |                 |                  |                 |

## Site list for Multi-site (registered sites)

| Multi-site description (free text) |
|------------------------------------|
| Not applicable                     |

| Sub code | Site / Company Name | Address (inc postcode) | Country | Email | Phone | Activity | Product | Contact Name | Contact Address (inc postcode) | Contact Country | Contact Email | Contact Phone Number |
|----------|---------------------|------------------------|---------|-------|-------|----------|---------|--------------|--------------------------------|-----------------|---------------|----------------------|
|          |                     |                        |         |       |       |          |         |              |                                |                 |               |                      |

## List of Registered Subcontracted sites

| Site / Company Name | Address (Inc postcode) | Activity | Product | Contact Name | Contact Email | Contact Phone Number |
|---------------------|------------------------|----------|---------|--------------|---------------|----------------------|
| Not applicable      |                        |          |         |              |               |                      |

## Organisation Description

| Organisation main activity | Guidance                                                                                                                                                                                                                                                       |
|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| processing                 | Choose only one activity - this should be the main activity with regards to handling, processing, or trading certified products. Use your own judgement where there are multiple activities. Where 'Other' is selected, please add further detail in the table |
| Refinery                   |                                                                                                                                                                                                                                                                |

| Organisation full description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Guidance                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
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| <p><i>Trio S.p.A es una empresa dedicada a la refinación.</i></p> <p><i>It is a refiner of oils for animal, and specifically of marine raw materials.</i></p> <p><i>As of today, 89 people provide direct services.</i></p> <p><i>The plant has 1 refined plant called "animal nutrition"</i></p> <p><i>For the animal nutrition plant, the by-product derived from the omega plant is used, associated with saturated fatty acids, which are used as raw material, this last by-product is also part of the scope of this certification.</i></p> <p><i>There is a corporate general manager, and then there is a business manager, and under the business manager, there are sub-managers for production, quality assurance and environment, sourcing and business intelligence.</i></p> <p><i>FSSC 22000, V5.1, ISO 9001, ISO 14001 and MarinTrust CoC,</i></p> <p><i>The raw material comes from Peru, Chile, Morocco, Turkey, South Africa and India. And the main customers are oriented to petfood production and salmon industry.</i></p> <p><i>Omega's plant has tanks for exclusive use in case of receiving certified raw material. The finished products are packaged in 190 kilos, 920 kilos, 20 kilos. The next format will be in 20 kg.</i></p> <p><i>No MSC or ASC raw materials have been produced by TRIO, so to prove the traceability and mass balance systems, they were tested using non certified products.</i></p> | <p>Record here all relevant information about the organisation's structure and activities with respect to CoC certification. This can include:</p> <ul style="list-style-type: none"> <li>- organisational structure/ legal ownership</li> <li>- product flow</li> <li>- description of the traceability system</li> <li>- key products and activities</li> <li>- size of operation (e.g. number of employees, turnover, volume produced...)</li> <li>- subcontractors used for certified products</li> <li>- key risks of substitution between certified and non-certified products</li> <li>- specific circumstances</li> <li>- relevant company history</li> <li>- any other relevant element from a CoC perspective</li> </ul> |



# Chain of Custody (COC) V2 Factory Audit Report

## SECTION 1 – General Principles of Traceability

| Clause No. & Requirement                                                                                                                                                                                                                                                                                                      | Conforms<br>( Y, N or N/A) | Details / Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
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| <b>1.1</b> The applicant shall have a documented and signed policy that states that they are committed to achieving and adhering to the requirements of the MarinTrust Chain of Custody Standard.                                                                                                                             | Y                          | It was observed document called "Integrated Management System Policy", Version 12, March 2023, which indicates the commitment to continuous improvement, and making compliance with all those voluntary requirements, such as MarinTrust CoC.                                                                                                                                                                                                                                                 |
| <b>1.1.1</b> The applicant shall have a process to ensure that this policy is communicated to all staff within the site.                                                                                                                                                                                                      | Y                          | The policy described in 1.1. is duly posted in strategic areas of the plant, such as production offices. In addition, as part of the recruitment process, an induction that includes this policy is carried out. Besides, it was observed formal communication of this policy the past March 13, 2024.                                                                                                                                                                                        |
| <b>1.2</b> The applicant shall have a documented and <b>effective supplier approval and monitoring system</b> to ensure that incoming marine ingredients intended to be identified as compliant, are sourced from an approved fishery, or a certified supplier that holds a valid MarinTrust or MarinTrust CoC certification. | Y                          | The plant has a supplier evaluation procedure, code P-AL-AB-02, Version 0.9, April 2021, which establishes the evaluation and selection of suppliers based on the company's requirements. The definition is critical supplier, with category A. The evaluation of the company "Camanchaca S.A.", Coronel Plant, is observed. The result of the certification issued is observed in the evaluation. In addition, a demonstration of the supplier search in MarinTrust's web page is performed. |
| <b>1.2.1</b> MarinTrust compliant marine ingredients that are purchased via a third-party agent, or broker that does not physically handle or own the certified product the following shall apply:                                                                                                                            | NA                         | This requirement is not applicable because the company does not provide raw materials from third-party agents.                                                                                                                                                                                                                                                                                                                                                                                |



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| <b>1.2.1.1.</b> The applicant shall have documents/evidence provided from these suppliers in place, to prove the identity of the marine ingredient back to an approved fishery or by product.                                                                                                      | NA | This requirement is not applicable because the company does not provide raw materials from third-party agents.                                                                                                                                                                                                                                                                      |
| <b>1.2.1.2</b> The applicant shall ensure that they have been trained on the requirements to maintain the product integrity status of these certified materials and shall sign a form stating their commitment to the MarinTrust CoC standard.                                                     | NA | This requirement is not applicable because the company does not provide raw materials from third-party agents.                                                                                                                                                                                                                                                                      |
| <b>1.2.1.3</b> The applicant shall ensure that they have been trained on the requirements to maintain the product integrity status of these certified materials by an approved consultant or trainer to the MarinTrust programme.                                                                  | NA | This requirement is not applicable because the company does not provide raw materials from third-party agents.                                                                                                                                                                                                                                                                      |
| <b>1.3</b> A batch/lot record of all MarinTrust compliant marine ingredients received by the applicant shall be maintained.                                                                                                                                                                        | Y  | One traceability exercise was taken as part of this audit. It was possible to evidence that the principal legal document related to the control and tracing to the origin was the shipped templates. On these documents were possible to evidence the producer information like name, address, date of shipping; and information related to the weight and type of product shipped. |
| <b>1.3.1</b> The batch/lot record shall contain the following information;<br><ul style="list-style-type: none"> <li>• Supplier name</li> <li>• Supplier unique MarinTrust certificate number</li> <li>• Volume of MarinTrust compliant marine ingredients received from each supplier.</li> </ul> | Y  | Based on the information provided in 1.3, this information is supplied in shipped templates.                                                                                                                                                                                                                                                                                        |

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| <p><b>1.3.1.1</b> The batch/lot record shall contain the following information; <b>(DEROGATION CLAUSE)</b></p> <ul style="list-style-type: none"> <li>• Key Data Element (KDE) information on the source fishery for whole fish to include, fishing vessel(s), species, catch area and date of landing</li> <li>• Key Data Element (KDE) information on source processing factory for by-product trimmings to include factory name, species and date of production of the by-product trimming.</li> </ul> | NA | This requirement is not applicable.                                                                                                                                                                                                                                                                                               |
| <p><b>1.4</b> The applicant shall have a <b>documented product management system</b> in place to demonstrate how MarinTrust compliant marine ingredients are <b>segregated and labelled</b> from non-certified product during all the processes within the Applicants organisation.</p>                                                                                                                                                                                                                   | Y  | Regarding the fatty acid by-product, it is established that it is not a MarinTrust product. In the case of the omega plant production, a unique and differentiated batch code is established. This identification system is established in the product traceability procedure, code P-TE-AC-11, Version 13, Nov 2023.             |
| <p><b>1.5</b> The applicant shall have in place an effectively implemented procedure to deal with any non-conformances arising from a failure of the Marine ingredients product management system stated in 1.4, which may result in MarinTrust compliant Marine ingredients being mixed with non-compliant material.</p>                                                                                                                                                                                 | Y  | In the non-conforming product procedure, code P-GG-OO-04, Version 15, where the methodology for the control of adulterated products is established. The action plan is to raise a corrective action, by raising nonconformities. At the time of this audit, there are no actions related to substitution, mixing or mislabelling. |
| <p><b>1.6</b> Any Corrective Action Plans resulting from a non-conforming products procedure shall be</p>                                                                                                                                                                                                                                                                                                                                                                                                 | NA | No NCs were raised from evidence described in 1.4 and 1.5.                                                                                                                                                                                                                                                                        |

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| accurately documented and shall include a root cause analysis                                                                                                                           |    |                                                                                                                                                 |
| <b>1.6.1</b> Corrective Action Plans shall identify authorised responsible personnel to handle the remedial changes required based on their severity or risk.                           | NA | No NCs were raised from evidence described in 1.4 and 1.5.                                                                                      |
| <b>1.6.2</b> All remedial changes shall be part of a Corrective Action Plan to mitigate these incidents happening again in future and shall be time specified                           | NA | No NCs were raised from evidence described in 1.4 and 1.5.                                                                                      |
| <b>1.6.3</b> The applicant shall notify their certification body within 24 hours of a product recall being actioned as result of this non-conforming product procedure being activated. | NA | No NCs were raised from evidence described in 1.4 and 1.5.                                                                                      |
| <b>1.6.4</b> The applicant shall inform any customer affected by a non-conforming MarinTrust product <b>immediately, and no later than 24 hours</b> of detection.                       | Y  | In the product recall procedure, code P-TE-AC-10, a 12-hour deadline is established for both the certification body and the customers involved. |
| <b>1.7</b> All records relating to the execution of the non-conforming product procedure shall be retained for a <b>period of at least 3 years</b> .                                    | Y  | In the product recall procedure, code P-TE-AC-10, a 12-hour deadline is established for both the certification body and the customers involved. |

|                                                                                                                                                                                          |    |                                                                                                                                                                                                                                         |
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| <b>1.8</b> The applicant shall have a HACCP system in place to protect the integrity of products being produced within their operation.                                                  | Y  | The plant is duly certified under the FSSC 22000, V5.1 scheme, which, under ISO 22000:2018, chapter 8, indicates HACCP based on the codex Alimentarius. The certificate was issued by Bureau Veritas and is valid until March 27, 2027. |
| <b>1.8.1</b> The applicant shall have a TACCP/VACCP system in place to protect the integrity of products being produced within their operation if intended for direct human consumption. | NA | No applicable, because the plant does not have direct human consumption products.                                                                                                                                                       |

## SECTION 2 – Traceability Verification and Labelling

| Clause No. & Requirement                                                                                                                                                                                                                    | Conforms<br>( Y, N or N/A) | Details / Evidence                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
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| <b>2.1</b> MarinTrust compliant Marine ingredients, or the finished product <u>shall</u> be labelled or otherwise be identified in a manner that ensures traceability is maintained during the following key traceability steps MarinTrust: | Y                          | <p>Based on traceability exercise performed as part of this audit to lot 431013/0124000001, the following evidence was properly observed:</p> <ol style="list-style-type: none"> <li>Document called as "guia de despacho 11825" Document called as "OP refinaria con PCCs": On this documents, it is possible to evidence the bought of "crude salmon oil", 29,540 kg, dated on Feb 26, 2024.</li> <li>Document called as "OP refinado": On this document, dated on Jan 01, 2024, it is possible to evidence the following: <ol style="list-style-type: none"> <li>A total used of 75,000 Kg of "crude fish oil" and "salmon oil" (39,180 kg + 25,820 kg + 6,699 kg + 6,301 kg),</li> <li>Process order: 1026522,</li> <li>Documents called PCC1 (page 2 and page 5), both including the inclusion of 25,000 kilos of "aceite cargado" (charged oil) per 3 times.</li> </ol> </li> <li>Document called as "OP desodo": On this document, dated on Jan 04, 2024, it is possible to evidence the following: <ol style="list-style-type: none"> <li>A total used of 69,510 Kg of "Salmomega forte refinado"</li> <li>Process order: 1026527,</li> <li>Outlet deodored fish oil:" 67,920 kg.</li> </ol> Both documents included the lot number 1026522 (-1, -2 and -3).</li> </ol> |
| <b>2.1.1</b> from the point of receipt,                                                                                                                                                                                                     |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>2.1.2</b> during initial storage,                                                                                                                                                                                                        |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>2.1.3</b> during processing,                                                                                                                                                                                                             |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>2.1.4</b> during work in progress storage,                                                                                                                                                                                               |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>2.1.5</b> during packaging,                                                                                                                                                                                                              |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>2.1.6</b> during final storage, and third-party storage                                                                                                                                                                                  |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>2.1.7</b> during final dispatch, handling                                                                                                                                                                                                |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>2.1.8</b> during delivery to their customer                                                                                                                                                                                              |                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

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|                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |   | <p>4. Document called as "OP envasado": On this document, it is possible to evidence the packaging of 18,240 kilos of "salmomega Forte". The document attached as part of the quality control, based on lot 431013/0124000001.</p> <p>5. Label: It was observed the label. It is possible to evidence the lot number 431013/0124000001.</p>                         |
| <p><b>2.2</b> The applicant shall have documented evidence that MarinTrust compliant Marine ingredients are segregated from non-certified product by either:</p> <ul style="list-style-type: none"> <li>• Physical separation, or</li> <li>• Temporal separation,</li> </ul> <p>during the following key traceability stages<br/><b>MarinTrust:</b></p> <p><b>2.2.1</b> from the point of receipt,</p> <p><b>2.2.2</b> during initial storage,</p> <p><b>2.2.3</b> during processing,</p> <p><b>2.2.4</b> during work in progress storage,</p> <p><b>2.2.5</b> during packaging,</p> <p><b>2.2.6</b> during final storage and third-party storage,</p> <p><b>2.2.7</b> during final dispatch, handling</p> <p><b>2.2.8</b> during delivery to customer</p> | Y | <p>It was conducted a traceability exercise as part of this audit. The information provided by TRIO was following a regular traceability exercise.</p>                                                                                                                                                                                                              |
| <p><b>2.3</b> The applicant shall maintain accurate records of the quantities / volumes of MarinTrust compliant Marine ingredients and the finished product bought and sold (or received and dispatched) which take into account production practices that could affect the final quantity or</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Y | <p>In the document called "traceability", the following data are observed:</p> <p>MT and non-MT raw material identification, the quantity entering and not entering, and the total processed products and their totals are established.</p> <p>For May 2023, there is an initial stock of 809.77 MT of raw material, where the tanks show that they are at "0".</p> |

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| volume calculations using a MASS balance exercise.                                                                                                                                                                                             |    |                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>2.4</b> The applicant shall report on input quantities and finished product quantities used on a quarterly basis to MarinTrust ( <b>DEROGATED CLAUSE</b> )                                                                                  | NA | This requirement is not applicable                                                                                                                                                                                                                                                                                                                                                            |
| <b>2.5</b> The applicant shall conduct a documented verification test of their product management system across the entire range of MarinTrust compliant Marine ingredients or finished product by batch/lot number or volume produced.        | Y  | Two to three traceability exercises are carried out per year, the last one being dated October 2022. The last one was conducted the last April 2023, the result was that the evidence of 100% of the products was reached, and it was carried out in a period of 2 hours. The lot number sampled was 449002/0922000025, product Salmomega Forte, MarinTrust for client Royal Canin Argentina. |
| <b>2.5.1</b> This verification test shall be carried out at least once per year with a gap no greater than 12 months between tests, and shall include a traceability challenge both from receipt to despatch and from despatch back to receipt | Y  | Two to three traceability exercises are carried out per year, the last one being dated October 2022. The last one was conducted the last April 2023, the result was that the evidence of 100% of the products was reached, and it was carried out in a period of 2 hours. The lot number sampled was 449002/0922000025, product Salmomega Forte, MarinTrust for client Royal Canin Argentina. |
| <b>2.6</b> Any Corrective Action Plans resulting from non-conformities raised during this verification test of the product management system shall be accurately documented;                                                                   | NA | No NCs were raised from evidence described in 2.5.                                                                                                                                                                                                                                                                                                                                            |
| <b>2.6.1</b> Corrective Action Plans shall identify authorised responsible personnel to handle the remedial changes required                                                                                                                   | NA | No NCs were raised from evidence described in 2.5.                                                                                                                                                                                                                                                                                                                                            |
| <b>2.6.2</b> All remedial changes shall be part of the Corrective Action plan to mitigate these incidents happening again in future and shall be time specified.                                                                               | NA | No NCs were raised from evidence described in 2.5.                                                                                                                                                                                                                                                                                                                                            |

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| <b>2.7</b> Where processing or packing / repacking occurs, records shall allow conversion rates for the finished product outputs from MarinTrust compliant Marine ingredients inputs over any given batch or time period to be calculated.                                                                                     | Y | The plant does not commonly repackage refined product. If this activity is performed, the plant has records that establish the expected mass balance for each production.                                                                       |
| <b>2.8</b> The Applicant shall conduct an annual <b>internal monitoring audit of all MarinTrust processes including a documented product recall test or after traceability-based complaint or incident</b> test to ensure that the non-conforming product procedure as stated in 1.5 is functioning correctly and effectively. | Y | The last internal audit was carried out on January 05 and 06, 2023, which was based on the internal audit report 001-2023, which was complemented with the recall report carried out in October 18 <sup>th</sup> , 2023.                        |
| <b>2.9</b> All traceability and identification records <b>shall</b> be kept for <b>the shelf life of the product, or a minimum of 3 years, whichever is longer.</b>                                                                                                                                                            | Y | The retention time for documentation and records is 3 years. However, the organization establishes a storage over 5 years. This is defined in procedure called as "documentation and record control", P-GG-OO-02, Version 17, in the item 12.9. |
| <b>2.9.1</b> All records used to provide evidence of compliance to this MarinTrust CoC Standard shall be accurate, legible and unadulterated.                                                                                                                                                                                  | Y | It was possible to evidence an electronic and physical traceability system. The documentation based on traceability exercise asked by auditor, it was possible to evidence accurate, legible and unadulterated.                                 |
| <b>2.10</b> The applicant shall co-operate with the Certification body and/or MarinTrust CoC Standard holder if they are asked to participate in an MarinTrust product integrity investigation by the supplying of documentary evidence within 5 days of a request for information.                                            | Y | Based on the last renovated certification cycle and signed agreement signed between GlobalTrust and TRIO, they have the commitment to collaborate to MarinTrust in case of need it.                                                             |



## SECTION 3 – Subcontractors

| Clause No. & Requirement                                                                                                                                                                                                                                                                              | Conforms<br>( Y, N or N/A) | Details / Evidence                                                                        |
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| <b>3.1</b> Where the applicant utilises the services of a subcontractor (carrying out contract storage, processing, packing, labelling), the subcontractor shall be audited by the applicant's certification body and <b>shall be compliant with the requirements of the MarinTrust CoC Standard.</b> | NA                         | This requirement is not applicable, since the plant does not have the use of contractors. |
| <b>3.2</b> The applicant shall maintain an up-to-date record of the names and addresses of all approved subcontractors handling MarinTrust compliant marine ingredients and the identity of the certified finished products.                                                                          | NA                         | This requirement is not applicable, since the plant does not have the use of contractors. |
| <b>3.3</b> If third party storage facilities are used, the applicant shall have the ability to request the MarinTrust compliant marine ingredients and the certified finished products records from subcontractor storage facilities to allow for verification at any point in time.                  | NA                         | This requirement is not applicable, since the plant does not have the use of contractors. |
| <b>3.4</b> The applicant shall have a signed agreement with all subcontractors handling the MarinTrust compliant marine ingredients and the certified finished products:                                                                                                                              | NA                         | This requirement is not applicable, since the plant does not have the use of contractors. |

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| <b>3.4.1</b> This agreement shall ensure that the subcontractor has documented systems in place to ensure full traceability, segregation, and identification of the MarinTrust compliant marine ingredients and the certified finished products at every stage of handling in compliance with this MarinTrust CoC Standard. | NA | This requirement is not applicable, since the plant does not have the use of contractors. |
| <b>3.5</b> Where an applicant utilises the services of third-party transport companies, an agreement or equivalent documentary evidence shall be in place demonstrating that MarinTrust certified product integrity is ensured during transportation.                                                                       | NA | This requirement is not applicable, since the plant does not have the use of contractors. |
| <b>3.5.1</b> For bulk transported material, internal procedures and contractual agreements shall also include provisions that preclude the use of transport that may adversely affect the safety and/or integrity of any MarinTrust compliant marine ingredients materials due to the composition of a previous cargo.      | NA | This requirement is not applicable, since the plant does not have the use of contractors. |

## SECTION 4 – Use of the MarinTrust Certification Logo or Claim

| Clause No. & Requirement                                                                                                                                                                                                       | Conforms<br>( Y, N or N/A) | Details / Evidence                                                                                                                                                                                                                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>4.1</b> The applicant shall only use the MarinTrust CoC certification logo or claim if it has valid certification to this MarinTrust CoC Standard.                                                                          | Y                          | It was possible to observe that the plant has a logo use agreement, and the labels used for MarinTrust products have the logos. The use of the logo as part of products that have been mixed (case of animal production plant) is not observed.                                                                            |
| <b>4.1.1</b> The applicant shall only use the certification logo or claim if it has documented evidence demonstrating that it has been granted approval to do so by MarinTrust - the standard owner.                           | Y                          | The plant has a current logo use agreement, issued by MT's Assurance officer, from last April 03 <sup>rd</sup> , 2023.                                                                                                                                                                                                     |
| <b>4.2</b> The applicant shall follow the current MarinTrust logo guidelines for any logo used on their products and shall be verifiable.                                                                                      | Y                          | As explained in 4.1 and 4.1.1, the plant has the proper authorizations for the use of the MarinTrust logo, and it is used appropriately.                                                                                                                                                                                   |
| <b>4.3</b> The applicant shall operate a secure system for the production, storage and application of product labels bearing the MarinTrust CoC logo/claim to ensure that only compliant finished product is labelled as such. | Y                          | The label system is printed as required, and labels are duly controlled by the quality control area to ensure that they comply with lot identification, product type, and certification. Control is established by means of the "labelling and label control" record (audited sample, dated April 3 <sup>rd</sup> , 2023). |



## SECTION 5 – Staff Training and Key Representative Responsibilities

| Clause No. & Requirement                                                                                                                                                                                                                                          | Conforms (Y, N or N/A) | Details / Evidence                                                                                                                                                                                                             |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.1</b> The applicant shall put in place documented programmes covering the training needs of all KEY staff to the successful adoption of this MarinTrust CoC Standard                                                                                         | Y                      | There is an annually updated training program, where MarinTrust training is defined. The latest evidence was the completion of training on May 2023, the training of the new employees is defined to be conducted in May 2024. |
| <b>5.1.1</b> These documented training programmes shall include, as a minimum Identifying the staff training needs and the provision of training, to ensure that the staff have the necessary competencies to meet the requirements of this standard.             | Y                      | Yes, the program identifies the type of training, to whom it is directed, the date it should be given.                                                                                                                         |
| <b>5.1.2</b> The applicant shall review the effectiveness of all training provision on an annual basis.                                                                                                                                                           | Y                      | The effectiveness of the training is checked at each training session by conducting a knowledge test.                                                                                                                          |
| <b>5.2</b> The applicant shall identify and appoint an individual (MarinTrust contact person) who shall be responsible for all contact with the certification body and for responding to any requests for documentation or information related to CoC conformity. | Y                      | Yes, it is the currently quality manager, sonia.arancibia@fiordoaustral.cl                                                                                                                                                     |

|                                                                                                                                                                                                                                                                                                                         |   |                                                                                                                                                                                                                                                                                                                                 |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>5.3</b> The applicant's CoC key representative shall oversee the training provision review of the competencies of its staff, at least annually or after an incident.                                                                                                                                                 | Y | Based on the conversation conducted as part of audit, the quality manager has not seemed new competencies requirement to TRIO key members team. For this, the last training described on 5.1. was enough evidence to prove competency from them. Besides, based on 1.6.3, no real recall has been raised by TRIO the past 2023. |
| <b>5.3.1</b> Where additional training provision is required the applicant shall provide and conduct the relevant training in a time specified manner.                                                                                                                                                                  | Y | According to the annual plan, training is provided once a year.                                                                                                                                                                                                                                                                 |
| <b>5.4</b> Records of all training provision completed and planned shall be maintained and be accessible.                                                                                                                                                                                                               | Y | The auditor had total access of training certification of each key members.                                                                                                                                                                                                                                                     |
| <b>5.4.1</b> An employee training record shall include as a minimum: <ul style="list-style-type: none"> <li>• The name of the trainee and signed confirmation of attendance;</li> <li>• The date of the training;</li> <li>• The title or course contents, as appropriate;</li> <li>• The training provider.</li> </ul> | Y | According to the annual plan, the last training was provided the past May 10 and 12, 2023, and this one included the name and signature of each attendee, date of training and title including the topics.                                                                                                                      |
| <b>5.5</b> The applicant shall inform their certification body within 10 working days if they change their key representative member of staff and how they plan to induct a new member of staff to take over the role.                                                                                                  | Y | From last year, no change from key representative member.                                                                                                                                                                                                                                                                       |



## SECTION 6 – Specific Requirements for Marine Ingredients sourced from a fishery that has been accepted into the MarinTrust Improver Programme

This section is only applicable if the applicant is handling a marine ingredient that is made from a raw material source from an accepted MarinTrust Improver Programme fishery. Details of all fisheries that are included within this Improver Programme can be located on the MarinTrust Website

| Clause No. & Requirement                                                                                                                                                                                                                                                                                                                         | Conforms ( Y, N or N/A) | Details / Evidence                                                                                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|----------------------------------------------------------------------------------------------------|
| <b>6.1</b> The applicant shall be able to use marine ingredients from an Improver Programme if the following conditions apply <ul style="list-style-type: none"> <li>The Improver Programme is recognised by MarinTrust</li> <li>The facility also uses marine ingredient that have been certified to the MarinTrust Factory Standard</li> </ul> | NA                      | The plant does not use raw material as an improvement program, this requirement is not applicable. |
| <b>6.2</b> The applicant handling marine ingredients from a MarinTrust Improver Programme , shall comply with the following                                                                                                                                                                                                                      | NA                      | The plant does not use raw material as an improvement program, this requirement is not applicable. |
| <b>6.2.1</b> Marine ingredients coming from the MarinTrust Improver Programme shall be clearly identified from all marine ingredients from fully                                                                                                                                                                                                 | NA                      | The plant does not use raw material as an improvement program, this requirement is not applicable. |



|                                                                                                                                                                                                                                                                                                                                       |    |                                                                                                    |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----|----------------------------------------------------------------------------------------------------|
| certified Marin Trust products or non-certified product                                                                                                                                                                                                                                                                               |    |                                                                                                    |
| 6.2.2 Marine ingredients coming from the MarinTrust Improver Programme shall be clearly segregated, both during processing and during storage, from all certified Marin Trust or non-certified products                                                                                                                               | NA | The plant does not use raw material as an improvement program, this requirement is not applicable. |
| <b>6.3</b> The applicant shall have a traceability system in place that will allow them to demonstrate the traceability back to the accepted Improver Programme fishery or approved MarinTrust factory that is handling the Improver Programme fishery material                                                                       | NA | The plant does not use raw material as an improvement program, this requirement is not applicable. |
| <b>6.4</b> The applicant shall not use any logo from the MarinTrust programme on any product that contains ANY marine ingredients produced from the MarinTrust improver programme fishery. They will only be allowed to use an agreed claim to this improver programme if the material is made solely of MarinTrust improver material | NA | The plant does not use raw material as an improvement program, this requirement is not applicable. |

## List of Non-conformities

| No. | Status | Detail of Non-conformity | Corrective action timescale |
|-----|--------|--------------------------|-----------------------------|
|     |        | No findings raised       |                             |

## Definitions

### Chain of Custody (FAO derived Definition):

*The set of measures which is designed to guarantee that the fishmeal and fish oil product put on the market and bearing the MarinTrust logo is really a product of designated origin and coming from the certified factory concerned. These measures thus cover both the tracking/traceability of the product all along the processing, distribution and marketing chain, as well as the proper tracking of the documentation and control of the quantity concerned.<sup>2</sup>*

**Agent:** The agent works on behalf of either the seller or the buyer and facilitates the transaction (sale or purchase). The agent does not take ownership and can be seen as an alternative to having inhouse sales or purchase employees, they typically get paid a percentage of the activity. No activity, no cost.

**Applicant:** A company or group of companies in the supply chain that has **formally** applied to meet the Chain of Custody Standard through the formal Application Form.

**Broker:** A broker brings the buyer and seller together and gets a commission from either party or both. He/she does not take ownership. If the broker takes ownership, he/she becomes a principal and is thus a trader. A broker needs a good understanding of the products and applications and needs to have a good network. He/she does not need to have money, as he/she does not need to finance the goods, as he/she does not take ownership.

**Certificate Holder:** A company in the supply chain that has been formally Certified by the Certification Body as complying with the MarinTrust Standard and/or the Chain of Custody standard requirements.

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<sup>2</sup> FAO Guidelines for the Ecolabelling of Fish and Fishery Products from Marine Capture Fisheries, Rome 2005 + 2009



**Certification Bodies:** The bodies appointed by MarinTrust to audit, assess and monitor compliance of applicants and certificate holders under the MarinTrust Programme.

**Certified Claim:** A claim made by a certificate holder approved for use and licensed by the Standard Owner.

**Chain of Custody Standard:** The list of requirements that the Applicant must meet to claim Certification to the Chain of Custody Standard and /or use the Certified Claim.

**Key Data Element (KDE):** Data input required to successfully trace a product and/or its ingredients through all relevant CTEs.

**Marine ingredients:** Mainly fishmeal and fish oil derived from forage fish, but also marine organisms such as fish, krill, shellfish and algae

**MarinTrust Branding:** The name/s and logo/s as outlined in the MarinTrust Brand Guidelines

**MarinTrust Brand Guidelines:** The brand guidelines of MarinTrust, as set out in MarinTrust Brand Guidelines Document.

**MarinTrust Certified Factory:** An applicant factory who have successfully been certified as compliant with the MarinTrust Standard requirements.

**MarinTrust Chain of Custody (CoC) Certified:** An Applicant company or group of companies who have successfully been certified as compliant with the MarinTrust Chain of Custody standard requirements.

**MarinTrust Statement:** A statement that accurately describes the User's certification under the MarinTrust Programme

**Potential Applicant:** A company or group of companies in the supply chain that are considering applying for Chain of Custody Standard certification.

**Stage:** A handling / transfer point in the supply chain e.g. Packing, Processing, Distribution, Sales.

**Trader:** Person or company that buys and sells products. The trader has legal ownership of products, receives invoices and issues invoices and receives the full package of paper documentation. A trader may touch the product (trader with warehouse/storage tank) or a trader may merely trade the product without

physically receiving the product, as the product typically goes directly from the manufacturer to a manufacturing plant. The trader needs to; have a good network, understand the market, finance the purchase and sales of products and, be familiar with the international transport of goods in order to find the best and the cheapest means of transport.