

BOLTON FOOD TUNA SOURCING POLICY

In force from June 30th, 2019

Bolton Food uses the United Nations Sustainable Development Goals as guiding principles, particularly the the 14th goal *"to conserve and sustainably use the oceans, seas and marine resources for sustainable development."* As a result, Bolton Food is engaged in the careful management of tuna fisheries as a key feature of its social responsibility commitments and has developed the following requirements for all suppliers of Bolton Food involved in tuna fishing or processing:

- 1. Comply with European Regulations No. 853/2004 (hygiene rules for food of animal origin) and No. 1005/2008 (illegal, unreported and unregulated fishing);**
- 2. Comply with all applicable RFMO and ISSF conservation measures (<https://iss-foundation.org/what-we-do/verification/conservation-measures-commitments/>);**
- 3. Increase sourcing from Marine Stewardship Council (MSC) certified fisheries. For uncertified fisheries, ensure Robust Fishery Improvement Projects (Robust FIPs) are in place.**
- 4. Preferentially source tuna caught from more selective fishing methods with a lower level of by-catch and environmental impact (pole and line, hand line, FAD-free purse seine, small-scale purse seine vessels fishing only in the EEZ of their flag state and participating in a FIP) and provide appropriate documentation (e.g. catch certificates, Captain statements, third party CoC audits);**
- 5. For tuna caught by large-scale purse seiners, ensure FAD management measures are in place including:**
 - a. Not exceeding 300 active (i.e. deployed and activated within 5 miles from the boat only once) drifting FADs per vessel across the fleet and per RFMO area;**
 - b. Use only fully non-entangling FADs made primarily with natural materials by 2024.**
- 6. Comply with the "Dolphin Safe" program, as defined by the Earth Island Institute;**
- 7. Do not use tuna caught in marine reserves or protected areas identified by and located within the EEZ's of Coastal States;**
- 8. Do not use tuna caught by longline vessels for Bolton Food products unless the fishery is MSC certified or in a Robust FIP;**
- 9. Comply with the Code of Ethics and Human Rights Policy of the Bolton Group;**
- 10. Comply with the Bolton Food Code of Conduct for Tuna Suppliers (vessels):**
 - a. All Bolton Food owned vessels by 2020;**
 - b. All Large-scale purse seiners supplying Bolton Food by 2022;**
 - c. All vessels by 2024;**
- 11. Report all information regarding tuna traceability and transparency in the Bolton Supplier Workplace Portal, including fishing operations (fishing vessel, fishing trip, fishing gear, ocean, FAO area), transport and unloading (transshipment vessel, port of unloading), and processing (frozen loins and finished products);**



- 12. Collaborate with Bolton Food to verify compliance with this policy. Bolton supports a continuous improvement approach whereby non-compliance will be addressed with incremental corrective action plans.**