

**CODE OF CONDUCT  
FOR SUPPLIERS  
OF PRODUCTS AND SERVICES  
(BOLTON FOOD & TRI MARINE)**



**BOLTON**

# INTRODUCTION

Bolton Food & Tri Marine, the Food Business Unit of Bolton, is a global leader in the production and distribution of seafood and meat products. It works with well-known and respected brands such as Rio Mare, Saupiquet, Palmera, Isabel, Cuca and Simmenthal, and is committed to meeting the needs and expectations of its customers and end consumers by providing safe, high quality, and sustainable products.

Bolton Food & Tri Marine strongly believes that building long-term partnerships with suppliers means sharing risk and responsibility, and mutually agreeing on standards for both parties. As described in the **Ethical Trading Initiative's Guide to buying responsibly**, *"improving supply chain resilience and creating a fairer balance of power means investing in stable transparent supplier relationships and building your suppliers' capacity to drive positive change. Integral to this is sharing risk and responsibility and treating key suppliers as partners"*.

By agreeing and implementing this **Code of Conduct for Suppliers** (hereinafter **CoC**), Bolton Food & Tri Marine stands to strengthen the environmental impact of its activities and global supply chains, improving the wellbeing of millions of people whose livelihoods depend on its business and commercial activities.

To manage relationships with suppliers internally, **Bolton Food & Tri Marine adopts this CoC as a reference for supplier management**. Bolton Food & Tri Marine aims to be transparent about its values in its dialogue with its suppliers, so **this CoC is included and annexed to each supplier contract. Suppliers must comply with the contents of this CoC**.

Bolton Food & Tri Marine believes in maintaining continuous dialogue with its suppliers, partners, employees and civil society actors to improve current measures it has in place and future ones that Bolton Food & Tri Marine may develop to strengthen its commitment to an international 360° sustainable development standard to achieve the **UN 2030 Agenda and the Sustainable Development Goals**.

Thus, **all current and potential suppliers must sign this CoC for Suppliers** which sets out ethical performance standards for Bolton Food & Tri Marine's suppliers as a mandatory requirement for any company or organisation that wishes to remain or become a supplier to Bolton Food & Tri Marine **for a particular product or service category or geographical area**.

**Bolton Food & Tri Marine will randomly verify compliance with these requirements** through its internal **due diligence management system**. If any supplier has difficulty in upholding this **CoC**, **Bolton Food & Tri Marine will work together with the supplier to determine where any misalignment occurs in its supply chain**, identify the root causes of the problem, and find effective ways to correct the problem. The Bolton Food & Tri Marine will help to implement these measures and verify their effectiveness in correcting the incident.

Serious, repeated non-compliance and a clear lack of willingness on the part of the supplier to remedy the situation may lead Bolton Food & Tri Marine to break commercial relations with the supplier in question.

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- Mackerels and Sardines Policy
- Salmon Policy
- Mollusks Policy
- Oil Policy
- Vegetables Policy
- Meat Policy

## Additionally, as a buyer, Bolton Food & Tri Marine undertakes the following commitments in its relationship with its suppliers:

- To treat suppliers with respect and consideration in all dealings and communications.
- To communicate clearly, promptly, and accurately on all matters relating to orders.
- To never negotiating a price that is below the cost of sustainable production, as this may impact on workers' wages and working conditions and/or have a negative impact on the environment.
- To give preference to suppliers who ensure decent wages and working conditions for workers and comply with sustainable practices, rather than moving purchases to other suppliers purely on the basis of price.
- If the order has lead times that would result in excessive working hours or sub-contracting by the supplier, Bolton Food & Tri Marine is open to working with the supplier to develop possible alternative solutions.
- To strive to minimise repeated order changes at short notice. If changes are unavoidable, to discuss and agree new target delivery times with the supplier.
- Bolton Food & Tri Marine will explore the possibility of sharing the cost of implementing and monitoring improvements in working conditions, in certain circumstances, for example, when it falls beyond the means of the supplier
- To consider workers' pay and working conditions when reviewing our business relationship by assessing the supplier's commitment to comply with Bolton Food & Tri Marine's **CoC** as an important criterion for continuing our business relationship. Bolton Food & Tri Marine will evaluate criteria such as improvements in wages and working conditions, as well as the quality of the products supplied and the price of the products when approving or re-evaluating suppliers. Bolton Food & Tri Marine will not terminate relationships with suppliers based solely on price increases as long as these are justified by improvements in the other evaluable criteria.
- To support to our suppliers in their efforts to meet their obligations under this **CoC**.

## A. GENERAL REQUIREMENTS FOR ALL SUPPLIERS

Bolton Food & Tri Marine's core values and high-level policies are grounded in internationally recognised Human Rights standards laid out in the **Universal Declaration of Human Rights**, the **ILO Declaration on Fundamental Principles and Rights at Work**, the **UN Guiding Principles on Business and Human Rights**, and the **Ethical Trading Initiative Base Code**.

**Bolton's Code of Conduct** together with **Bolton's Human Rights Policy** are at the top of regulatory pyramid through which the Group establishes the core principles and values which are expected and required of all Bolton's companies, their employees, managers, governing bodies, stakeholders and suppliers. They provide a framework of shared integrity for all when conducting professional activities.

**Bolton Food & Tri Marine's CoC** has been developed based on these two high level documents to better communicate to Bolton Food & Tri Marine's suppliers the high standard of ethical behaviour that is required of them to become and remain part of Bolton Food & Tri Marine's supplier family.

### 1. BOLTON'S HIGH-LEVEL POLICIES

#### 1.1. BOLTON CODE OF CONDUCT

Bolton has adopted a Code of Conduct compliance with which is mandatory for everyone in the organisation. It serves as the basis for both Bolton's internal activities and the relationship with all Bolton stakeholders and, in particular, with all its suppliers of products and services.

As a member of Bolton and an active player in the seafood processing industry, Bolton Food & Tri Marine believes it is extremely important to behave as expected for a socially responsible organisation. Therefore, it endeavours every day to conduct all activities at its facilities and those of its partners and suppliers with the utmost respect and consideration for human rights, the ethics that should govern human and trade relations, respect for the environment, and concern for resource sustainability.

From the perspective of its customers and end consumers, Bolton Food & Tri Marine is responsible for the entire supply chain of the products it offers, from sea/farm to fork. It is therefore essential for Bolton Food & Tri Marine to gain its suppliers' trust not only in the products, but also in the Company's values and attitudes.

#### 1.2. BOLTON HUMAN RIGHTS POLICY

**Human Rights Policy** is grounded in the Group's core values and Code of Conduct. Respect for the principles expressed in the **Bolton's Human Rights Policy** is to be considered as an integral part of the duties of all its employees, relevant stakeholders, and suppliers. A shared commitment to improving working and social conditions is integral to achieving a fairer balance of power and improving workers' lives.

Respect for fundamental human rights is a core element of Bolton's sustainability strategy. Dignity and respect for the individual are at the heart of Bolton's corporate culture that is shared with Bolton Food & Tri Marine. As such, the Bolton Food & Tri Marine promotes respect for Human Rights and takes appropriate measures to prevent, mitigate and remedy any violations, both within the company and among its suppliers throughout Bolton Food & Tri Marine's entire supply chain.

Bolton Food & Tri Marine's relationship with its stakeholders is based on transparency and mutual trust. For this reason, Bolton Food & Tri Marine implements and supports the internationally recognised Human Rights set out in the **ILO Core Conventions** and the **Universal Declaration of Human Rights** and the conventions inspired by them, - regardless of whether they have ratified them or not - as well as the **Ethical Trading Initiative Base Code**.

**Bolton's Human Rights Policy covers the most important individual principles that all our suppliers must comply with:**

- REGULAR AND FREELY CHOSEN EMPLOYMENT
- FREEDOM OF ASSOCIATION AND RIGHT TO COLLECTIVE BARGAINING
- HEALTH, SAFETY, AND WORKING CONDITIONS
- NO CHILD LABOR
- LIVING WAGES
- NO EXCESSIVE WORKING HOURS
- NO DISCRIMINATION AND HARSH TREATMENT
- RIGHTS OF LOCAL COMMUNITIES
- REPORTING VIOLATIONS

## **2. COMPLIANCE WITH APPLICABLE LEGISLATION**

The requirements that Bolton Food & Tri Marine demands of its approved suppliers shall always be understood as additional to full compliance with the applicable legislation within the scope of their activity, both locally and internationally, including - but not limited to - those relating to international trade (such as those relating to sanctions, export controls, and reporting obligations), the environment, data protection, and anti-trust and competition laws.

Where national laws and international human rights standards differ, Bolton Food & Tri Marine will follow the higher standard; where they conflict, Bolton Food & Tri Marine will respect national laws while respecting human rights to the greatest extent possible and will expect its suppliers to do the same.

## **3. COMMITMENT WITH FOOD SAFETY, PRODUCT QUALITY AND NUTRITION**

The safety and quality of the products offered by Bolton Food & Tri Marine are a strategic priority.

Every product or service supplied to Bolton Food & Tri Marine must be strictly managed, meet the criteria set out in the purchase agreement, and be suitable for its intended use, complying with the specifications, quality, and safety criteria specified in such agreements.

The Bolton Food & Tri Marine requires its suppliers to be authorised by the local authorities to carry out their activities and, where appropriate, establishments must be approved for export to the European Union. When appropriate, they must be included in the official lists of approved establishments by the Directorate-General for Health and Food Safety of the European Commission (DG-SANTE).

The implementation of certified food safety and quality management systems will be highly valued, and all our suppliers are encouraged to take this path. Bolton Food & Tri Marine will conduct regular evaluations of our suppliers' facilities and procedures to guarantee the final quality of the products they produce and to verify that our partners consider our expectations of continuous improvement in all their activities. Companies that agree to undergo Bolton Food & Tri Marine's homologation process must accept to undergo all the audits required by Bolton Food & Tri Marine in the scope of food safety, quality, and corporate social responsibility.

All suppliers must ensure that the products supplied to Bolton Food & Tri Marine are fully traceable, safe, and that the levels of contaminants and undesirable substances potentially present are below the limits agreed with Bolton Food & Tri Marine's Quality Department and applicable local legal limits. In addition, all suppliers must guarantee the full traceability of the products they supply to Bolton Food & Tri Marine, complying fully with the requirements established in the technical product specifications in force and approved by Bolton Food & Tri Marine's Research and Development Department.

Research and innovation activities shall be conducted in a responsible way, based on good clinical practice and generally accepted scientific, technological, and ethical principles.

Adequate procedures and communication channels must be in place to ensure that Bolton Food & Tri Marine is immediately notified about any kind of quality or safety problem regarding the product supplied involving the supplier or along the supply chain.

#### **4. ENVIRONMENTAL COMMITMENT**

Bolton Food & Tri Marine expects its suppliers to have a high degree of environmental awareness which must be demonstrated by a clear effort to minimise the impact of their activities on the environment to embrace environmental sustainability. All of Bolton Food & Tri Marine's partners are encouraged to take all measures in their hands, not only to minimise negative environmental impacts, but to move towards improving environmental conditions.

Bolton Food & Tri Marine requires its suppliers to adopt and adhere to a documented public environmental policy and to establish action plans to cover the most important aspects of its business which could adversely affect the environment: the management of hazardous waste, subproducts, water, emissions, and energy based on recognised international best practices.

Bolton Food & Tri Marine aims to drive change along our value chain by reducing the Greenhouse Gas (GHG) emissions intensity of all its activities, including better management of inputs and avoidance and adaptation techniques to mitigate emissions. Bolton Food & Tri Marine expects and values its suppliers to join these efforts towards a circular economy and net zero GHG emissions, and to facilitate and support Bolton Food & Tri Marine in Scope 2 and 3 emission calculations when required.

Bolton Food & Tri Marine acknowledges that the consequences of a collective failure with higher temperatures, rising sea levels and more extreme weather events will affect us all, along with increasing political and economic instability resulting from the displacement of people from areas that may literally become uninhabitable.

As a leading food company, Bolton Food & Tri Marine fully supports the need for urgent action to improve the resilience and sustainability of our entire supply chain and to contribute to wider efforts to move towards a net zero economy.

Bolton Food & Tri Marine has identified various contributions to GHG emissions related to its activities, concluding that the majority lie outside its direct control, i.e. Scope 3 emissions that include emissions embedded in the raw materials and other inputs, and in the way its products are used after sale. Bolton Food & Tri Marine is committed to controlling Scope 1 and Scope 2 emissions and needs the support of all its suppliers with the ultimate goal of working together to also reduce Scope 3 emissions along the supply chain. Relevant initiatives in this regard would involve energy and water saving programs to improve existing operations, increased use of renewable energy such as solar, wind, and biogas from anaerobic digesters.

Bolton Food & Tri Marine therefore expects its suppliers to commit to cooperating with Bolton Food & Tri Marine by providing the requested data so it can calculate the carbon footprint, or the environmental footprint of products or services provided to Bolton Food & Tri Marine more generally. Measuring environmental impacts throughout the life cycle of products is an essential measure to improve the environmental performance of a certain product or service. Without the cooperation of its suppliers in collecting reliable primary data on the raw materials it purchases, Bolton Food & Tri Marine cannot lay the groundwork for a reliable calculation of the environmental footprint of its products, nor can it measure the benefits of more sustainable practices adopted by suppliers which would frustrate their efforts.

Bolton Food & Tri Marine also encourages its suppliers to adopt circular economy practices which can lead to a more conscious use of available resources such as water or other raw materials, and to savings through waste reduction and reuse.

Finally, Bolton Food & Tri Marine expects its suppliers to implement an environmental management system in their establishments and to be ISO 14001 certified or to become ISO certifiable in the medium term. Suppliers that are certified under ISO 14001 must inform Bolton Food & Tri Marine of this fact. If not yet certified, Bolton Food & Tri Marine will work with the supplier to establish agreed action plans including an estimated timeline to complete the process. To the best of its abilities, Bolton Food & Tri Marine will provide help and support to suppliers who need it, with a view to working together to achieve common goals.

## **5. COMMITMENT TO HEALTH AND SAFETY**

Bolton Food & Tri Marine requires its suppliers to adopt and adhere to the documented health and safety commitments described in **Bolton's Human Rights Policy**.

In addition, the Bolton Food & Tri Marine expects its suppliers to implement a health and safety management system in their establishments and to be ISO 45001 certified or to become ISO certifiable in the medium term. Suppliers that are certified under ISO 45001 must inform Bolton Food & Tri Marine of this fact. If not yet certified, Bolton Food & Tri Marine will work with the supplier to establish agreed action plans including an estimated timeline to complete the process. To the best of its abilities, the Bolton Food & Tri Marine will provide help and support to suppliers who need it, with a view to working together to achieve common goals to ensure workers are adequately protected.

## **6. COMPANY RELATIONS WITH THIRD PARTIES: ANTI-CORRUPTION POLICY**

Bolton Food & Tri Marine rejects any kind of corrupt act or behaviour.

Bolton Food & Tri Marine has adopted very stringent requirements in terms of honesty and integrity in its internal relationships and expects the same level of demand in relations with its partners and suppliers.

Giving or receiving bribes is illegal, fundamentally unethical, and may have severe consequences for everyone involved, including the imprisonment for individuals and heavy fines for the company. Bolton Food & Tri Marine is committed to conducting its business with transparency and integrity and, consequently, all its transactions must comply with anti-corruption laws, including the requirement to keep full and accurate account books and records.

### **Gifts, services and other benefits**

Bolton Food & Tri Marine personnel must not solicit, negotiate or accept gifts or gratuities from suppliers, consultants or service providers for its own benefit or for the benefit of others, unless this action is legal, ethical and a generally accepted business practice between Bolton Food & Tri Marine and the third party.

Bolton Food & Tri Marine personnel cannot accept or give any type of gifts that might jeopardise or appear to jeopardise their honest decision-making process in some current or future negotiation. Conditioning or attempting to condition a negotiation in exchange for a gift, service, or courtesy is forbidden.

Gifts, services, and other presents from customers, suppliers, or current or future consultants are acceptable only if they are given for legitimate business purposes. Moreover, gifts, services, or other courtesies may not be received from third parties, except when they are legitimate promotional materials in line with acceptable business standards and practices and only with a testimonial economic value. Accepting these gifts should not jeopardise or appear to jeopardise Bolton Food & Tri Marine's integrity and objectivity or create an expectation of obligation towards the third party.

These complimentary gifts must always be legal and in line with acceptable business standards and practices. Trying to condition a commercial negotiation with a gift for a customer, supplier, consultant, or service provider is forbidden.

Suppliers shall not offer, grant, request or accept any gifts or donations to/from Bolton Food & Tri Marine buyers which might infringe the provisions of this **CoC**.

If any supplier or other third-party attempts to condition any negotiation or business relationship with gifts or dishonest financial compensation, all Bolton Food & Tri Marine personnel is obliged to bring the matter to the attention of their superiors and the legal or compliance department responsible for ensuring the integrity and honesty of the company's commercial and business relationships.

### **Bribery and/or blackmail**

Under no circumstances are bribery, blackmail, corruption, extortion, or embezzlement permitted. If anyone in the Company is being bribed and/or blackmailed in their work relations inside or outside the organisation, they should report it immediately. Bolton Food & Tri Marine requests adequate are in place to prevent bribery in all commercial dealings undertaken by the supplier.

### **Corrupt practices**

Suppliers and Supplier Representatives shall not, directly, or indirectly, including through an agent or other intermediary, engage in corrupt, fraudulent, collusive, anti-competitive or coercive practices in bidding for, or performing, a Bolton Food & Tri Marine financed contract or activity.

### **Conflict of interest**

A conflict of interest occurs when personal interests or the interests of a third party compete with the interests of Bolton Food & Tri Marine. If a conflict of interest has occurred or Bolton Food & Tri Marine's personnel finds themselves faced with a situation that could involve or give rise to a conflict of interest, they must notify their superiors and the legal or compliance department responsible so that the situation can be resolved fairly and transparently.

## **Transparency**

Suppliers shall carry out their activities in an honest, upright, and transparent way. To this end, they shall maintain an appropriate accounting system that facilitates the traceability of their decisions, as a preventive measure against any type of corruption, bribe and extortion that might arise.

Suppliers shall not offer or accept remuneration of any kind which seeks, or may be perceived to seek, to influence the impartial judgment or the objectivity of the parties appointed by Bolton Food & Tri Marine to carry out inspections and compliance audits in relation to this **CoC**.

All business and commercial dealings must be performed transparently and recorded accurately in the supplier's books and records. There shall be no actual or attempted involvement in money laundering. No confidential information in the supplier's possession regarding Bolton Food & Tri Marine shall be used either to engage in or support insider trading.

Suppliers shall implement appropriate financial transaction policies and procedures to ensure all financial transactions are recorded properly and possible money laundering is identified. No undisclosed or unrecorded account, fund, or asset shall be established or maintained.

Suppliers shall not manipulate or influence their workers, nor shall they forge any files or records to alter the verification process regarding compliance with this **CoC**.

## **Confidentiality and Data Protection**

Suppliers shall preserve the integrity and confidentiality of the information they may receive because of their commercial relationship with Bolton Food & Tri Marine. Bolton Food & Tri Marine's confidential information, know-how, and intellectual property shall be respected and safeguarded. All information provided by Bolton Food & Tri Marine may only be used for its intended and designated purpose.

Personal information about individuals, such as Bolton Food & Tri Marine's consumers and employees, shall be handled with full respect for the protection of their privacy and in compliance with all relevant privacy laws and regulations and shall not be kept for longer than reasonably necessary and permitted by law.

All information about Bolton Food & Tri Marine's competitors shall be obtained legitimately and may only be used for legitimate purposes in compliance with all relevant anti-trust and other applicable laws and regulations. No attempt shall be made at any time to provide Bolton Food & Tri Marine with any information about Bolton Food & Tri Marine's competitors that could be reasonably considered confidential to them and not available in the public domain.

The obligation to maintain confidentiality shall survive the termination of the relationship with Bolton Food & Tri Marine and it shall include the obligation to return any material related to the Company in the supplier's possession.

## **Access for Verification and Reporting of Non-Conformities**

Bolton Food & Tri Marine's suppliers must give permission and collaborate with Bolton Food & Tri Marine staff or their representatives to verify full compliance with this **CoC** as a necessary precondition for establishing commercial relations between Bolton Food & Tri Marine and any supplier, including unannounced on-site inspections of their facilities and/or social or employment matters (interviews with employees, employment agencies, local NGOs, trade unions and other workers' representatives, etc.) and combined social audits with impact assessments to ensure adherence to the **CoC** in order to remedy or terminate the relationship, if necessary, and to follow best practices in measuring ethical and environmental performance.

If non-conformities are discovered in relation to aspects required by this **CoC**, Bolton Food & Tri Marine expects its suppliers to bring such non-compliance to its attention so that the situation can be analysed jointly, and appropriate and satisfactory action plans can be established to remedy the situation and enforce compliance with this **CoC**.

Bolton Food & Tri Marine will endeavour to work with any potential supplier who wishes to comply with this **CoC** but is currently unable to meet its commitments to become an approved supplier through capacity building or training programs, except in cases where significant non-conformities are detected.

Suppliers may be required to report to Bolton Food & Tri Marine on their business relationship with any subcontractor involved at any level with the products or services contracted by Bolton Food & Tri Marine. It is the supplier's responsibility to guarantee that these subcontracted suppliers are aware of and apply this **CoC** in its entirety. In any case, Bolton Food & Tri Marine's approved suppliers are responsible for guaranteeing that all the products they supply to Bolton Food & Tri Marine meet all the criteria required by the applicable local and international legislation at all times.

## **7. REPORTING BREACHES**

Bolton Food & Tri Marine is strongly committed to a culture of speaking out on behalf of its own workers and those of its suppliers without fear of retaliation against those who report actual or suspected breaches. Bolton Food & Tri Marine shall provide confidential reporting channels to comply with the standards established by the current regulations and, specifically, those resulting from the **EU Whistleblower Protection Directive**.

If a supplier becomes aware of any breach of the contents of this **CoC**, the supplier shall immediately notify Bolton Food & Tri Marine through the channels established for this purpose. Failure to do so shall constitute a breach of this **CoC**.

Bolton Food & Tri Marine shall also verify the existence of adequate operational grievance mechanisms throughout the supply chain and ensure that all people (direct or non-direct workers, suppliers, sub-suppliers, or outsourcing companies) have access to at least one operational grievance mechanism that meets the criteria of effectiveness and protection of the rights of the complainant established in the **United Nation Guiding Principles for Business and Human Rights (UNGP)** or in the **ISO 37002:2021 'Whistleblowing management systems – Guidelines'**.

Every grievance mechanism channel shall be widely communicated to ensure workers and stakeholders are aware of them, understand how to use them, feel confident in doing so, have effective access, and are guaranteed confidentiality, fairness, transparency and anonymity (where permitted by law) to communicate any kind of complaint/communication that should be investigated.

Bolton Food & Tri Marine will investigate any communication and discuss its findings with the supplier. The supplier shall assist Bolton Food & Tri Marine in such an investigation, provide access to any information requested, and cooperate if corrective action is required to resolve the issue.

Bolton Food & Tri Marine's procedure for reporting breaches and grievances through the **Bolton Speak Up System** is published on the Bolton website.

## B. SPECIFIC REQUIREMENTS FOR SUPPLIERS OF TUNA OR PRODUCTS CONTAINING TUNA

Tuna is the most important raw material for Bolton Food & Tri Marine. In addition to the general requirements for all Bolton Food & Tri Marine suppliers, tuna suppliers must commit to promoting and supporting compliance with the key elements and requirements set out in the following specific **CoC for Vessels and Tuna Policy** in order to become one of Bolton Food & Tri Marine's approved suppliers.

Bolton Food & Tri Marine provides operational guidelines to its suppliers in the **Guide for Suppliers of Tuna and Tuna Products** and the **Vessel Code of Conduct and Verification Evidence** – to serve as tools to help them to systematize compliance with the specific requirements established in the mandatory codes and policies.

### 1. BOLTON FOOD & TRI MARINE'S CODE OF CONDUCT FOR TUNA SUPPLIERS – VESSELS

Experience shows that one of the most vulnerable links in the supply chain, exposed to human and labour rights violations, are the crews of the vessels that supply Bolton Food & Tri Marine with raw materials and, in particular, those that supply Bolton Food & Tri Marine with tuna. Bolton Food & Tri Marine has decided to address this specific issue of fishing fleets by increasing the level of control and monitoring of the respect on board and by vessel owners and captains of each of the principles set out in the **Bolton's Human Rights Policy**.

As a result, a more specific code of conduct has been developed that applies to all tuna suppliers operating at sea.

The **Code of Conduct for Tuna Suppliers – Vessels** addresses each of the principles set out in the **Bolton's Human Rights Policy** and establishes a minimum set of compliance criteria that must be required on board fishing vessels and by vessel owners and masters. These principles and criteria, adopted by Bolton Food & Tri Marine, are to be considered *"the essential and most relevant core criteria"* that are included in the core and relevant **ILO Conventions** enshrined in the **ILO Constitution**, regardless of the member's ratification status, and the **Ethical Trading Initiative**.

Bolton Food & Tri Marine requires effective promotion and support from all its suppliers engaged in fishing activities and/or other operations at sea.

### 2. BOLTON FOOD & TRI MARINE'S TUNA POLICY

Bolton Food & Tri Marine has adopted the **United Nations Sustainable Development Goals** as its basic guiding principles, particularly **SDG 14 "Life below Water: conserve and sustainably use the oceans, seas and marine resources for sustainable development"**.

To support the above, Bolton Food & Tri Marine has determined that the environmentally and socially respectful management of tuna fisheries is a core aspect of its sustainability commitments, and that Bolton Food & Tri Marine must require the commitment of its suppliers and business partners to improve and reinforce the key elements and requirements set out in this Policy.

Bolton Food & Tri Marine is determined to significantly increasing the proportion of its tuna caught in **Marine Stewardship Council (MSC)** certified fisheries, or sourced from **Comprehensive and Credible Fishery Improvement Projects (CC FIP)**<sup>1</sup>. For tuna sourced from fisheries not yet certified by MSC, Bolton Food & Tri Marine will ensure that CC FIP are in place in those fisheries or that they have entered into the “In Transition to MSC program” (ITM) or into full MSC assessment. This decision to using more MSC certified tuna drives us to encourage our suppliers to participate in MSC certification initiatives, reflecting our serious commitment to the environmental sustainability standards for fisheries advocated by Bolton Food & Tri Marine.

Bolton Food & Tri Marine requires suppliers to provide appropriate documentation (e.g. catch certificates, captain’s declarations, third party CoC audits) with the dual objective of ensuring full traceability of the products delivered to Bolton Food & Tri Marine and also combating illegal, unreported and unregulated (IUU) fishing.

Bolton Food & Tri Marine is a proud founding Participating Company of the **International Seafood Sustainability Foundation (ISSF)** since 2009 and as such, both our fishing policy and third party sourcing comply with the **Conservation Measures** and recommendations issued by the ISSF. We agree with the ISSF on the advisability of a global scientific approach, respecting the indications provided in the most recent updates of the **Status of the Stocks** report ([LINK](#)) and its resolutions. All Bolton Food & Tri Marine tuna suppliers are required to verify the specific Conservation Measures in force on the ISSF website ([www.issf-foundation.org](http://www.issf-foundation.org)). Compliance with these measures is mandatory to supply tuna and tuna-based products to Bolton Food & Tri Marine.

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<sup>1</sup>According to WWF, we consider a FIP as credible and comprehensive when it is compliant with all the criteria of both definitions:

- **Comprehensive FIP:** A FIP that addresses the full range of environmental challenges considered within the MSC Standard, with the aim of having the fishery perform at the level of an unconditional pass against the MSC standard. A comprehensive FIP needs to conform to the following criteria: a scoping document and MSC pre-assessment has been completed by an independent third-party auditor; an action plan has been established; the FIP has been publicly launched; the FIP has entered its implementation stage, that is stage 3 within FIP guidelines; the fishery is making progress according to the action plan designed to reach a level consistent with the MSC standard within the agreed time frame (max. 5 years); progress is to be evaluated by an external independent consultant periodically for the entire duration of the FIP.
- **Credible FIP:** A FIP whose actions are transparent; complies with a process for clearly showing improvement in fishery performance; and can demonstrate fishery evaluation through a robust, independent assessment process and is rated “A” or “B” in fisheryprogress.org.

## C. SPECIFIC REQUIREMENTS FOR OTHER RAW MATERIAL SUPPLIERS

In addition to the general requirements for all of Bolton Food & Tri Marine's suppliers, other raw material suppliers must agree to promote and support adherence to the key elements and requirements set out in the following specific policies on raw materials to become one of Bolton Food & Tri Marine's approved suppliers.

- Mackerel, Anchovy and Sardine Sourcing Policy
- Salmon Sourcing Policy
- Molluscs Sourcing Policy
- Oil Sourcing Policy
- Vegetables Sourcing Policy
- Meat Sourcing Policy

### TO BE FILLED IN BY THE SUPPLIER:

By signing this document, (the supplier) \_\_\_\_\_ undertakes to join Bolton Food & Tri Marine on its strategic Sustainability Journey by promoting and supporting the guidelines and the actions described in Bolton Food & Tri Marine's Code of Conduct for Suppliers, with the aim of progressively complying with all the requirements applicable to the specific commercial relationship with Bolton Food & Tri Marine stated in this document.

<b>Company:</b>			
<b>Name:</b>			
<b>Function/Position:</b>			
<b>Signature:</b>		<b>Stamp:</b>	

### FINAL REMARKS

The Global Sustainability Function of Bolton Food & Tri Marine approved this Code of Conduct for Suppliers of Products and Services, on December, 2023.

For more information on this document, please contact Bolton Food Sustainable Development Department: [sustainability@boltonfood.com](mailto:sustainability@boltonfood.com).

You can find all the corporate Policies and Codes of Conduct [here](#).



THINK BEFORE YOU PRINT



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