

This Report has been made with the data of the four-year period 2014-2017 of Bolton Alimentari and Saupiquet. Bolton Food, the new Bolton Group Business Unit active in the food sector, includes Bolton Alimentari, Saupiquet and Garavilla.



The Right Course

Socio-Enviromental Report 2017



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Bolton Group's sustainability, a daily choice

Bolton Group is present in 139 countries and over 100 million households with a vast array of consumer goods and leading brands, known and appreciated for their quality. These include Rio Mare, Saupiquet, Simmenthal, Isabel, Omino Bianco, Neutro Roberts, Borotalco, Collistar, Somatoline Cosmetic, UHU and Bison. The fields in which we work comprise Food, Household and Laundry Care, Adhesives, Personal Care and Cosmetics.

We are a multinational, family firm of over 5,000 people that has always been known for its strong entrepreneurial culture based on shared values. Our Ethics Code is a document that provides guidance for our dealings with employees, business partners and the community at large. The guiding principles by which we define ourselves are: entrepreneurial spirit, passion for excellence, a commitment to achieving results, responsibility, honesty, integrity and sustainable development.

It is usual for a family business to have a long-term outlook, to promote development that will meet people's current and future needs, and to listen to their concerns, in addition to those of business counterparties, customers, suppliers and the community in general.

Corporate social responsibility is thus a natural evolution of our entrepreneurial culture. We are aware that we need to act to ensure the economic sustainability of our business, but at the same time, we are committed to offering quality products, to conserve natural resources, to respect the environment, and to generate value for our people and the community.

Based on this vision, we developed a sustainability program for the Bolton Group named "We Care". Our sustainability model is designed to form part of the value chain and to have a strategic impact on our activities. This approach commits us to the more sustainable procurement of raw materials, to reducing the impact of our manufacturing operations and to pursuing the wellbeing of our employees and the communities in which we operate.

At our food division, Bolton Food, we have integrated sustainability into our daily decisions for many years, focusing in particular on promoting sustainable fishing and protecting the marine ecosystem. We have been working towards achieving this objective since 2016 thanks to the implementation of numerous projects, including a partnership with the WWF. Thanks to the commitment of all the people who work at Bolton Food, we have achieved goals in our sustainability program that have often exceeded even the most challenging objectives.

We are aware that much work remains to be done and accordingly, we reaffirm our commitment to the future by setting ourselves even more ambitious goals to which we will dedicate all the energy and professionalism for which our Group is renowned.

Marina Nissim

CEO Bolton Group

"The best fish from better seas"

Many years have passed since we first plotted our 'Right Course', a journey towards achieving sustainability for Bolton Alimentari. Since that time, thanks to the launch of Bolton Food and the new strategic direction undertaken, we have come a long way. We have a new strategy in which sustainability is fully integrated into our work. As leaders in the sector, we believe that it is our responsibility, particularly on the subject of sustainability, to continuously work towards achieving increasingly ambitious standards in order to drive the entire sector towards real change. This is especially true in a rapidly evolving market where consumers are increasingly aware of topics related to development and sustainable consumption.

In conjunction with our partners, our aim is to include both the concept of circular economy, intended as our commitment to guaranteeing the regeneration of natural capital combined with social equity, and the 2030 Agenda of the United Nations and its 17 Sustainable Development Goals (SDGs), in our sustainable development strategy. In order to achieve measurable objectives of improvement we are currently working on eight SDGs.

Our commitment to sustainability is a daily commitment, pursued by all Bolton Food employees who work every day at our plants and offices across the world, and who do so responsibly. Bolton Food, indeed, is present on 4 continents, owns 7 fishing vessels and operates 6 plants worldwide. 'Responsibility' is in fact, the key word that has guided us since 2008 on our journey along the 'Right Course: responsibility to the environment and the oceans to ensure that they continue to be a resource for future generations; responsibility to people and the communities that work in our supply chain; and lastly, responsibility to those who have loyally purchased our products for the past ten years.

We work in the food industry. Those involved in the industry feel a greater responsibility than others, both up and downstream; a responsibility that it is difficult to avoid. Our plants represent the physical aspect of our commitment. Those working in the food industry have a double responsibility because our sector procures resources even more directly than others from the planet, and transforms these into food, i.e. into life for the people who inhabit it.

Although this is the noblest job in the world, you need to know how to do it well.

Since our inception, we at Bolton Food have had a deep understanding of this way of thinking. This is a way of thinking that we began implementing ten years ago into a long-term plan.

As far as we are concerned, this is a journey that we need to embark upon together. We have undertaken it with our institutional partners, our suppliers (across all continents and oceans), our clients, and above all, our people, who increasingly embrace this concept as a mission and a way of doing business.

For years, there has been a lot of talk about sustainability and social responsibility. Owing to the fact that we at Bolton are practical people, we have made sustainability our 'modus operandi' since the very beginning.

We don't believe that doing business means making profits and then creating a sustainability program. We believe that doing business means, today more than ever before, creating sustainable economic development, that is in balance with the planet and compatible with the development of society and the communities in which we operate.

Those who are fishermen by profession and involved in this, just as we are at Bolton with our seven fishing vessels, are well aware of the limitations that we face every day. If you overfish one day, on the next day the fishing expedition will be at risk. At Bolton Food we are well aware of this and operate accordingly.

Giuseppe MoriciCEO Bolton Food



Our results in the quest for Responsible Quality



About ten years ago, when Bolton Alimentari decided to embark on a new strategic path, which today we proudly call "Responsible Quality", there were many doubts as to what being sustainable meant in a

large business like ours. Since then, **our new strategic vision has led to many successes and changes**: we have embarked upon an ambitious and certainly challenging path with professionalism and passion and it has led us to becoming leaders in sustainability and best practice initiatives, capable of driving the sector towards new horizons.

In its previous Socio-Environmental Report, published four years ago, Bolton Alimentari committed to undertaking a journey towards the "Right Course" for sustainability. Today, in my capacity as Bolton Food Sustainable Development Director, I am proud to present the results of our commitment which do not constitute a point of arrival, but of departure towards even more ambitious and challenging goals, which, effective 2018, we have consolidated into a five year strategy that sets the objective of "becoming the most sustainable and responsible tuna business in the world".

Sustainability has increasingly become a strategic driver for our business's success and a mainstay of our corporate values and culture. In the four years covered by this report, many projects and initiatives have been carried out in the four areas that constitute the pillars of our sustainability strategy: fishing and protection of the marine ecosystem, environmental performance of our production facilities, respect for people and promotion of proper nutrition.

We started out with the conviction that, in order to make fishing truly sustainable, it is necessary to involve all the key players associated with this long and complex supply chain. For this reason, we have undertaken commitments that have been integrated across the entire supply chain, involving suppliers and the local communities in which we operate. This has enabled us to further diversify fishing methods, to increase tuna and mackerel catch quotas in MSC certified areas and to

guarantee the complete traceability of our products across the entire supply chain thanks to the implementation of an ISO 22005 traceability system, which is one of the world's best and enables us to track the history of each of our cans and to make this information available to the end consumer. Our commitment has been made even more concrete by the launch, in December 2016, of a responsible fish sourcing partnership with WWF Italy and WWF International, which, by 2024, will enable us to source solely MSC certified tuna or tuna originating from robust Fishery Improvement Projects (FIPs). In this regard, we ended 2017 with a significant figure that confirms that we are on the right course: 52.4% of the tuna purchased by Bolton Alimentari comes from responsible procurements. The partnership allows to guarantee a better management of the fisheries and to increase the transparency along the entire supply chain, also raising the awareness of the consumers on the importance of sustainable fishing. We have in fact taken the same commitment for the other fish species used for ours products, namely salmon, mackerel and sardines.

Furthermore, we have continued with our efforts to protect the environment by improving our packaging in order to reduce its environmental footprint and maximize recycling and reuse. These projects have enabled us to win three consecutive editions of the CONAI eco-friendly packaging award thanks to a reduction in the thickness of our packaging materials.

Responsible Quality, however, also means **respect for all those who contribute to the success of our business**. For this reason, we have implemented Bolton Group's **Human Rights Policy**, a document that actively commits us, together with our suppliers, to guaranteeing the protection of all those who work across our supply chain.

To promote proper nutrition and a healthy lifestyle, we have continued and strengthened our **support to scientific research** by collaborating with authoritative partners such as the Nutrition Foundation of Italy and the International Foundation for the Mediterranean Diet.

It is based on these results that we wish to reaffirm, in an increasingly ambitious manner, our commitment to complete sustainability, from sea to consumer. A commitment that should be increasingly shared and integrated into our business processes and, one that should address all our stakeholders' concerns. The decision to publish this report solely online, as was the case for the last edition, is also proof of the attention we pay to the environment and ecosystems, enabling us, inter alia, to provide interactive and dynamic access to its content

To conclude, I would like to provide the reader with some information to facilitate the reading of this document. This report consists of five chapters corresponding to our areas of action: strategic direction, fishing and protection of the marine ecosystem, respect for the environment, respect for people and the value of wellbeing. Each chapter contains a summary of the results achieved in the four-year period 2014-2017 and sets out future objectives.

We already look forward to our next report, which will tell of the objectives and results of Bolton Food, the new Bolton Group Business Unit encompassing Bolton Alimentari, Saupiquet and Garavilla.

I wish to thank all those colleagues who collaborated in the preparation of this document and the readers who have accompanied us so far along our path of sustainability, and I wish them all a pleasant read!



Luciano Pirovano

Sustainable Development Director Bolton Food





Euro 698 million

Total revenue



932

Number of employees



Number of operations

Our production plants are located in Cermenate and Quimper











Number of product categories

Tuna, salmon, mackerel and sardines

Bolton Alimentari is part of Bolton Food, the Bolton Group business unit active in the food sector. We produce and sell canned fish under the Rio Mare, Palmera and Saupiquet brands. We are an Italian success story and have become the European leader in the canned tuna market.

Our mission is to be the leader in the sustainable and quality production of long-life fish products aimed at making people's lives easier and healthier. With this in mind, **for over 50 years** we have produced quality canned fish consisting of tuna, salmon, sardines and mackerel that is sold in more than 45 countries around the world. Our production takes place mainly at two plants: at **Quimper (France)** and **Cermenate (Italy)**. The latter is the largest and most technologically advanced production plant in Europe and amongst the world's top facilities for the production of canned tuna.

The markets in which we operate

Rio Mare: Albania, Saudi Arabia, Australia, Austria, Bahrain, Belgium, Bosnia, Bulgaria, Canada, Cyprus, Croatia, South Korea, Egypt, United Arab Emirates, Estonia, Jordan, Greece, UK, Israel, Italy, Kosovo, Kuwait, Latvia, Lebanon, Libya, Lithuania, Macedonia, Malta, Moldova, Montenegro, The Netherlands, Poland, Qatar, Czech Republic, Romania, Russia, Serbia, Slovakia, Slovenia, Switzerland, Ukraine, Hungary and the USA.

Palmera: Italy.

Saupiquet: Belgium, France, Germany.



Our history



Foundation. With the opening of the plant in Cermenate, in the Province of Como, Trinity Alimentari S.p.A., subsequently renamed Bolton Alimentari S.p.A., is founded. Launch of the Rio Mare brand, marking our entry into the canned tuna market. The brand's distinctive traits are the pink colour of its cans and the slogan "tuna so tender that you can cut it with a breadstick", a catchphrase that immediately became part of Italian consumers' collective awareness and one that, within a few years, made it a national benchmark in the field of canned fish.

Growth. A few years after its launch, Rio Mare acquires Italian market leadership and advances on a path of growth that begins with the launch of new products, the acquisition of new brands and expansion into foreign markets. During this period, the range is enhanced by products such as Rio Mare "Insalatissime", Salmon Fillets, Mackerel Fillets and Patè. The company gradually enters the main European markets and continues its expansion into the Middle East, Africa and North America. In 1999, it acquires Saupiquet, a market leader in France and Germany and, in 2007, Palmera, an established Italian brand.





The sustainability era. Since the beginning of the 2000s, the company becomes aware of the fact that it has a leading role to play in facilitating greater reconciliation between the economic, environmental and social sustainability of the sector.

Bolton Alimentari is among the founding members of the *International Seafood Sustainability Foundation* (ISSF - http://iss-foundation.org/), the leading international nonprofit organisation for the sustainability of tuna fisheries.





Launch of our "Responsible Quality" Corporate
Social Responsibility program. The aim of this program
is to convey the concept of 360° Quality to all our
stakeholders. This concept is pursued responsibly across
the entire supply chain, from sea to consumer, in
respect of the environment and people.







Bolton Alimentari is the **first in Italy**, and among the first in the world, to obtain **ISO22005** certification for the traceability system of its tuna loins supply chain

Bolton Alimentari enters into **partnership with WWF**with the objective of procuring, by 2024, 100% of
its fish from MSC certified fisheries or from robust
fishery improvement projects with obtainment of MSC
certification as their end goal









Bolton Group's commitment to sustainability

Sustainability has always been one of the pillars of the Bolton Group's strategy and business model, a commitment certified by the publication of the **Ethics Code** (http://www.boltongroup.net/flash/Code-of-Ethics/brochure.html), which has been adopted by all the Group's companies. The Ethics Code sets out our key conduct principles, it provides guidance on our activities and aims to promote deep, widespread and participative sharing of the values to which we aspire: it is signed by all those who act in the name of and on behalf of the Bolton Group since it constitutes a key element of our corporate culture and life.

In 2016, the Ethics Code was supplemented by the publication of a new **Human Rights Policy**, which sets out our and the Group's commitments to all the people who work with us.

Lastly, in December 2016, the Bolton Group announced the launch of the "We Care" sustainability program founded on three strategic pillars: sustainable sourcing, sustainable production and people, which means giving value to the people who work for the Group and to consumers who choose our products every day. The plan was accompanied by internal communication activities targeted at all companies to raise awareness and inform employees of the Group's commitment to sustainability.

This commitment encompasses the organisation of periodic quarterly internal CSR Committee meetings, which are attended by all the companies of the Group, providing an opportunity for discussion and sharing of best practices and the implementation of common projects. Lastly, the Bolton Group's Board has the task of establishing strategic direction and of assessing the results of sustainability policies.

Bolton Group's values

Our daily work is inspired by Bolton Group values:

- → Entrepreneurship: we offer
 a challenging, interesting and
 gratifying work environment where
 creativity, promptness in seizing
 opportunities and ability to take calculated
 risk are encouraged and rewarded.
- → Passion for excellence: Good is not enough: we strive for excellence in all our products and services. Our people at all levels are motivated to overcome challenges and seize opportunities to make the most out of any situation.
- Responsibility: we are constantly committed to delivering excellent results by offering increasingly more value to consumers and customers and by keeping our organisation effective and efficient.
- Honesty and integrity: acting with respect and fairness in all our dealings is at the core of our solid professional reputation.
- \bigcirc
- Sustainability: we promote a model of economic, social and environmental sustainability to protect our natural resources, now and for generations to come.





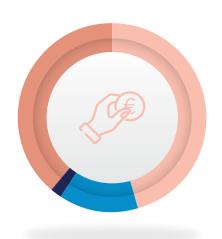
Key figures for 2017

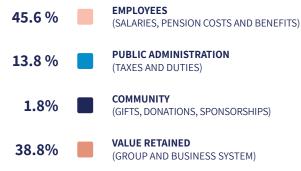
- → Total revenue: Euro 698 million
- → **Number of operations:** 2. Our production plants are located in Cermenate and Quimper
- → Number of employees: 932
- → Number of product categories: 4: tuna, salmon, mackerel and sardines
- → Number of cans produced every day in the production plants: production capacity of approximately 3.5 million cans per day
- → Reduction of greenhouse gas emissions in absolute terms: -20% during the course of the four-year period
- → Reduction of water consumption per ton of production: -10% during the course of the fouryear period
- → Waste recycling and recovery rate in the production plants: >99% in 2017
- → Tuna from sustainable sources: 52.4% of procurement

Economic value generated and distributed

The last four years were characterized by extremely positive results from an economic viewpoint: our business is growing in a sound and sustainable manner. In fact, between 2014 and 2017, revenue generated by the Rio Mare, Saupiquet and Palmera brands grew from Euro 624 million to Euro 698 million, an increase of approximately 12%.

Our performance also improved in terms of the added value distributed to our stakeholders and which is calculated as the difference between the economic value generated and the business' operating costs. In 2017, we distributed 45.6% of value added to our employees, in the form of salaries, pension costs and benefits. 13.8% was distributed to the public administration as taxes and duties, 1.8% was distributed to the local community as sponsorships, donations and gifts that are described in more detail in the chapter on "Respect for people", while the value retained by the business (depreciation and amortisation, allocations to provisions and profits retained by the Group) came to 38.8%.

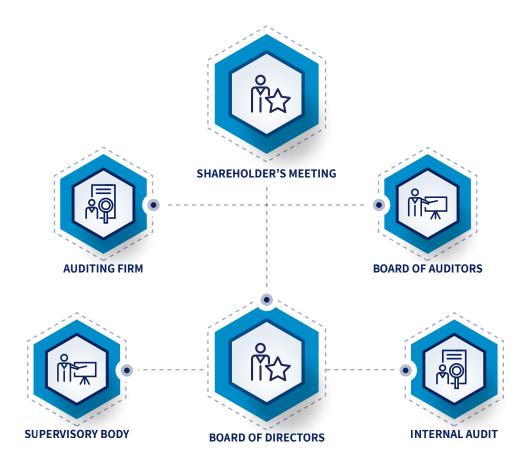




Who we are

Governance model and organizational structure

Bolton Alimentari S.p.A's organizational structure is set out in the following organization chart:



The Board of Directors, which is comprised of four members, is appointed by the shareholders' general meeting; it answers thereto for its actions and is responsible for the ordinary and extraordinary management of the company.

Our company is subjected to an external audit by a firm of independent auditors and has a **Supervisory Committee** and an **Internal Audit** function at Group level, which ensures the monitoring and control of potential risks within the company, as well as compliance with the principles laid down by our **code of ethics**.

The internal control system is based on an organisational, management and control model that meets the requirements of Legislative Decree 231/2001 and its subsequent additions and amendments, which requires the identification of business activities that could lead to the commission of offences and which establishes

the general principles, the structure and components of the internal organisation, and the management and control of risks. Moreover, our Model 231 requires all company personnel to promptly inform the Supervisory Committee in the event of an alleged or potential offence and introduces disciplinary procedures to sanction noncompliance with the measures indicated therein.

The Group's ethics code, in turn, is considered to be a key element of Model 231 and constitutes the architrave of our internal regulatory framework and the key tool for the dissemination of a culture of ethics and corporate transparency, as well as an essential element of the internal control system which is presided over by the Supervisory Committee.





02.

The sea, our past and our future





The sea, our past and our future

Culture and history of fish

Food has an imaginary and expressive component and a communication potential that, in addition to its taste, involves ideas and feelings. Historians call it the 'food statute'.

During the course of history, the fish statute has been particularly complicated and multifaceted. In ancient times, it was a subsistence food for many populations, but also a food of desire, imbued with multiple gastronomic implications. Things changed in the Middle Ages, when the Christian Church introduced the obligation of abstaining from meat for many days of the week and year (overall, almost one out of every three days) linking fish, as a substitute for meat, to images of penance and abstention that adversely affected its purely gastronomic aspects. At the same time however, fish consumption became widespread, encouraging the improvement of food preservation techniques inherited from antiquity (salting or drying fish or pickling it in either oil or vinegar) and the development of important preserving industries.

It was only towards the beginning of the 18th century that ecclesiastical rules were sidelined. Aristocratic

cuisine, now transformed in terms of lightness and finesse, embraced fish on account of its taste. In fact, in his cookery book (1694), Antonio Latini described it as "the tastiest and most delicious food that nature has ever produced." 'Freed' from its image as a meat substitute, between the 18th and 19th centuries, fish regained an autonomous role on a gastronomic level and began to accompany - and not just replace - meat in menus.

Between the 20th and 21st centuries, an epoch-making transformation saw a transition from a world of hunger to a world of abundance, a world that feared an empty stomach (therefore causing it to seek hearty, filling food) to a world that feared a full stomach (thus marking an orientation towards light food). 'Lightness' was no longer associated with abstention and fish achieved a new statute of excellence which simultaneously involved connotations of health and pleasure.

Text edited by **professor Massimo Montanari**Professor of Medieval History and History of Food
at the University of Bologna



The sea, our past and our future

The reasons for our commitment

Our contribution to Sustainable Development Goals (SDGs)

Sustainable Development Goals (SDGs) are a list of 17 international goals drawn up by the United Nations in September 2015. These goals cover all the main areas of intervention concerning global sustainable development, including protection of the planet and the fight against hunger and poverty. The SDGs, which are valid from 2015 until 2030, constitute a call for action for all public and private players at global level to unite and work together to solve the challenges of sustainable development. Since their publication, our sustainability strategy has considered them as a reference point to determine the priorities and areas of intervention for each of the 5 pillars on which our corporate social responsability approach is based.



Fishing and protection of the ecosystem: goal 14 -Life below water

Oceans are an essential component of the earth's ecosystem. They host over 50% of the planet's biodiversity and absorb over 25% of carbon dioxide in the atmosphere, thus assuming a fundamental role in guaranteeing the balance of terrestrial ecosystems¹.

The health of the seas strongly influences businesses in the fish supply chain: this is a significant sector that gives work to more than 200 million people, most of whom live in developing countries². Moreover, fish accounts for 17% of the protein consumed at global level. In such a complex market, it is essential that businesses conduct their activities sustainably, in full respect of the marine species and the local communities with whom they work. In recent years, the international community has felt a growing need to promote actions to alert players in the supply chain about issues concerning sustainable fishing and protection of the oceans. For this reason, protection of the oceans has been included in the list of the 17 Sustainable Development Goals (SDGs) to be achieved by 2030.

It is worth remembering that our commitment to sustainable fishing comes from afar; we were, in fact, among the founding members of the International Seafood Sustainability Foundation (ISSF), which has endorsed the United Nations' commitment to pursue the sustainable use of oceans. Established in 2009,

the ISSF is a global, non-profit organization whose members and partners include several of the world's most eminent scientists and marine biologists, NGOs and WWF International, whose objective is to ensure the sustainability of tuna stocks, the reduction of bycatch and the protection of the marine ecosystem, through investment in research and international advocacy activities.







Production and respect for the environment: goal 6 - clean water and sanitation, goal 7 - affordable and clean energy, goal 12 - responsible consumption and production

On the whole, environmental sustainability constitutes one of the key challenges facing the international community. Among the various topics outlined, climate change³ is one of the most critical. The United Nations' Paris Agreement, finalized in December 2015 and ratified by more than 100 countries, aims to keep global warming below a threshold of 2°C by 2050; in order to achieve this goal, scholars estimate that between now and 2030, at least \$90 trillion need to be invested in the modernization of existing infrastructure and the creation of new sustainable infrastructure⁴.

Another key goal is water resource management, a goal to which industry could contribute by reducing waste and improving the quality of water to reduce pollution. Lastly, industry could contribute to Millennium Development Goals by adopting production models that make efficient use of natural resources by significantly reducing waste production through prevention, recycling and reuse and, more specifically, by recovering food that is currently wasted across the production and supply chain: goals that can also be achieved by raising consumer awareness about more sustainable lifestyles and behaviour.

- World Economic Forum and International Centre for Trade and Sustainable Development, "Trade Policy Options for Sustainable Oceans and Fisheries", 2016.
- World Wildlife Fund, "Reviving the Ocean Economy. The case for action", 2015.
- 3) World Economic Forum, "Global Risks Report", 2017.
- Global Commission for the Economy and the Climate, "New Climate Economy Report: The sustainable infrastructure imperative", 2016.





Respect for people: goal 8 - decent work and economic growth, goal 2 - zero hunger

Entrepreneurial activity drives economic growth and job creation. In recent years, a new awareness of the social dimension of sustainability, focusing on human rights, personal growth, quality of life and the promotion of diversity and equality, emerged. These issues are also important for the fishing industry, which, as previously stated, has a supply chain that is particularly long and complex and often involves developing countries. For this reason, the main players in the sector must commit to promoting and guaranteeing respect for human rights across the entire value chain.

Since the publication of the Universal Declaration of Human Rights in 1948, numerous international organizations, including the Organization for Economic Co-Operation and Development (OECD) and the Danish Institute for Human Rights, have joined forces to promote and issue a series of guidelines and conventions to which players in the fish supply chain can aspire in order to conduct their activities in respect of human rights and create a virtuous cycle. The principles contained in these documents have formed the basis for our Human Rights Policy and for the assessment of our suppliers and business partners. Moreover, on account of the role played by artisanal fishing in our supply chain and in countries around the world where it is practised, the methods used to interact with small-scale fishers and their local communities are crucial to increase productivity and guarantee their access to adequate food quantity and quality for their subsistence.



Proper nutrition: goal 3 - health and wellbeing

For a food company, the successful implementation of the third SDG, "Good health and wellbeing", which aims to promote health, wellbeing and healthy lifestyles and to combat premature mortality from non-communicable diseases through prevention and treatment, is essential.

With an increase in pathologies such as obesity, diabetes and other chronic diseases⁵, not only typical of 'Western' but also other diets, more and more consumers are

questioning the nutritional properties of the products they purchase, asking themselves how they can contribute to a varied, balanced diet and what food companies do to ensure quality and safety. Comprehensive information on food labels is thus a key purchase driver for consumers. Moreover, activities that companies can promote to educate people about lifestyle choices and healthy, balanced diets are increasingly important. To this end, product innovation can also help by providing consumers with practical and balanced solutions for their meals, in line with current trends and needs.



Governance: goal 17 - partnerships for the goals

The successful implementation of the Sustainable Development Goals partly depends on the manner in which public, private and non-profit entities work together to overcome difficulties that are increasingly encountered by the community. Based on this awareness, as shown by our participation in the ISSF and, more recently, our agreement with the WWF, we are always open and available to the constitution of multi-stakeholder partnerships that mobilize and share knowledge, expertise, technology and financial resources, to support the achievement of sustainable development goals in all countries, particularly developing countries.

World Health Organisation and Food and Agriculture Organisation, "Diet, nutrition and the prevention of chronic diseases", figures updated to June 2016.







NE ARE

SUSTAINABILITY

FISHING

PRODUCTION

Responsible Quality: our sustainability model

In 2011, we launched "Responsible Quality", our program of Corporate Social Responsibility, whose aim is to convey our concept of 360-degree Quality to all our stakeholders. This concept is pursued responsibly across the entire supply chain, from sea to consumer, in respect of the environment and people. During the course of 2017, we transformed sustainability into one of our key strategic drivers, by updating our sustainability plan and establishing new goals and targets for the next five years. We achieved this by using an OGSM (Objectives, Goals, Strategies, Measures) planning process, which provides clear goals, identifies the strategic choices to achieve them and establishes the measures to verify their status. We chose this methodology because it helps various functions work together toward common objectives, while keeping account of market developments and the expectations of our stakeholders, with whom we have established an open, ongoing dialogue.

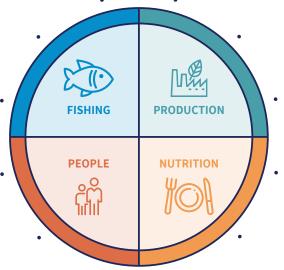
Our new, ambitious strategic goal is to "become the most sustainable and responsible tuna business in the world" via the pursuit of the following specific targets:

- 1. To adopt and promote sustainable fishing;
- 2. To produce in low environmental impact plants;
- To develop our employees' wellbeing and to generate positive social impacts across the supply chain;
- **4.** To manufacture premium-quality products for a varied, balanced diet.

Implementation of the plan is reliant on a governance system that will be illustrated in the following paragraph, whereas strategies and specific indicators of results relating to the four previously mentioned strategic objectives will be addressed in subsequent chapters.

To adopt and promote sustainable fishing

To produce in low environmental impact plants



To develop our employees' wellbeing and to generate positive social impacts across the supply chain

To manufacture premium-quality products for a varied, balanced diet

The sea, our past and our future

Sustainability governance

The relaunch of our sustainability strategy also involved the determination of a new governance structure aimed at improved integration of CSR into business practice.

The **Sustainable Development Department** - headed by a **Sustainable Development Director** who reports directly to the Managing Director (CEO) - is responsible for the daily management of CSR activities. In particular, the department ensures the integration of sustainability goals into corporate strategy, it defines and updates policies and handles the coordination of same with members of the Group, it manages stakeholder relations and reports on the results achieved.

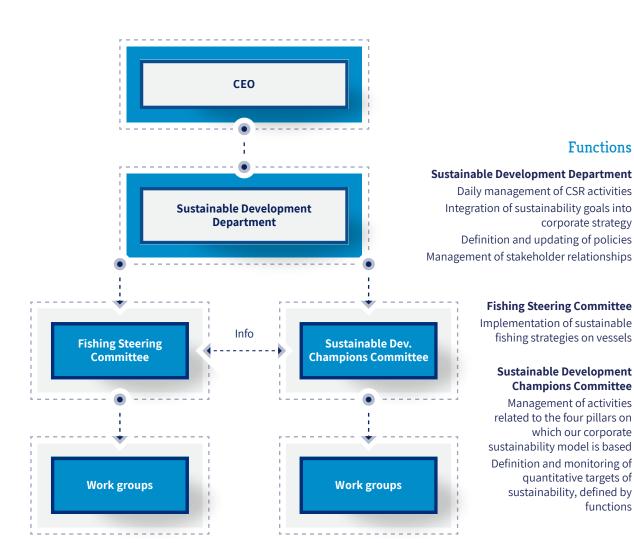
The Sustainable Development Department has **two committees**: one specifically dedicated to ensuring implementation of sustainable fishing strategies - a key issue for our business - and another dedicated to the management of the activities related to the other three

pillars on which our sustainability model is founded: production in low impact facilities, the wellbeing of our employees and the community in which we operate, and the offer of premium-quality products for a varied and balanced diet.

The latter committee is responsible for defining the sustainability targets for the commitments stated in this document: these will be made public on our website responsible quality.com within the next six months.

Lastly, the operational implementation of the specific activities envisaged by the sustainability plan is entrusted to working groups comprised of functions directly involved in projects.

Thanks to the efforts made during the course of the last four years, our employees' awareness of sustainability issues have increased, as has their willingness to personally commit, on a daily basis, to improving corporate performance in this area.







Our stakeholders

The stakeholders with whom we engage are shown below.



The sea, our past and our future

WHO WE ARE

Best practices for stakeholder engagement: retailers, environmental organizations and institutions

Retailers

Thanks to the use of questionnaires and research, we monitor the satisfaction level of our customers to better understand how our products are perceived in comparison to those of our competitors and what the specific needs of a constantly evolving market are. Every year, the ten key French and Italian retailers of large-scale-retail-trade are involved in this research.

The results show that our customers are extremely satisfied with the services that we provide. In particular, during the course of 2016, our performance exceeded the category average with a score of 3.7/5 in Italy and 7.1/10 in France. The aspects most widely appreciated by our customers include the variety of products offered and the wealth of information provided on the packaging, as well as the promptness and expertise of our sales staff.

Furthermore, to monitor retailer satisfaction we organize periodic meetings with our key customers - either on an individual or group basis - in order to obtain further suggestions for improvement and feedback on how we are doing.

Additionally, based on our objective of sharing respective visions, strategies and future actions, our meetings with retailers dedicated to sustainability have become more frequent.

Environmental organizations

Strategic decisions related to sustainable fishing and the integrated management of environmental impacts

are also the result of an ongoing dialogue with the environmental organisations committed to these sectors - both at national and international level (WWF and Greenpeace) - with which we engage via an open and shared approach to our business's social responsibility.

In particular, engaging with the WWF has led to the formation of a partnership for the implementation of the corporate roadmap for the sustainable procurement of fish products and the achievement of the target to source 100% sustainably-fished resources. The partnership with the WWF has also led Bolton Alimentari and Bolton Group, respectively, to sign the WWF Global Seafood Charter for companies and the S.O.S. (Safe Operating Space) FOR A SUSTAINABLE FUTURE, by means of which the businesses acknowledge the need to respect our planet's environmental boundaries and to consequently commit themselves to inclusive and sustainable economic development.

Institutions

In conjunction with governmental institutions, our company is also committed to promoting the achievement of ocean-related sustainable development goals. On 5 and 6 October 2017, we participated in the fourth edition of the "Our Ocean" conference in Malta, which was hosted by the European Union. This event has reaffirmed the importance of collective action by government institutions, industry and NGOs to ensure a future for our oceans. In particular, outcomes at this edition included: 433 tangible and measurable commitments; Euro 7.2 billion in financial pledges; and 2.5 million square kilometres of additional Marine **Protected Areas**. This was the first conference that saw a large-scale mobilisation of the business community; corporate leaders responded with 100 commitments, including plastic reduction, satellite monitoring and sustainable fishing.





Fishing and respect of the marine ecosystem



52.4 %

Tuna sourced from sustainable fisheries



1+3

We are involved in 1 MSC certified fishery (Solomon Islands) and 3 Robust FIPs (TUNACONS, OPAGAC, SIOTI)









81 %

Of our total mackerel procurement is MSC certified



ISO 22005

Our supply chain is 100% ISO 22005 certified

For a total of 500 products and 10 product lines

Sustainable tuna fishing

A scientific, global and systematic approach

Driven by a scientific, global and systematic approach, our company has been committed to the issue of sustainable fishing since its inception, particularly tuna fishing. As demonstrated by prominent scientists and marine biologists, this is a complex issue. It is a challenge that can only be achieved by involving all players in the industry (vessel owners, the canning industry, non-governmental organizations and institutional bodies). Our ultimate objective is to work together to find a balance between the different dimensions that make fishing truly sustainable: tuna stock status, marine eco-system health and the management of fishing zones.

To this end, in 2009, we were among the founding partner companies of the *International Seafood Sustainability Foundation (ISSF)*⁶, a global, non-profit organization whose members and partners include several of the world's most eminent scientists and biologists and various NGOs, including WWF International. Approximately 75% of the world's tuna processing firms are ISSF members, explaining why it has become a global reference point for sustainable tuna fishing. The organization's objectives include long-term tuna stock sustainability, promotion of the protection and health of the marine ecosystem, and the reduction of bycatch. The ultimate objective of the ISSF is to ensure that all fisheries are capable of meeting



the Marine Stewardship Council (MSC) certification standard. To achieve this, the ISSF pledges ten million dollars to scientific research activities at sea, enabling it, amongst other things, to identify solutions to reduce the phenomenon of bycatch.

Based on the results of its scientific research, one of ISSF's main activities is the adoption of conservation measures aimed at improving the management of the global tuna fishing industry. ISSF participating members have committed to respecting these measures and to undergo annual third-party audits conducted by MRAG Americas, a private consulting and auditing company focused on activities that support the conservation of marine ecosystems.

The most important conservation measures include⁷:

- → A commitment not to make purchases from vessels registered by the EU or RFMO (Regional Fishery Management Organization) in the IUU (Illegal, Unreported, Unregulated Fishing) list;
- → The obligation, when fishing from large Purse Seiners, to only make purchases from vessels registered in the ProActive Vessel Register (PVR), a register instituted by the ISSF to identify and trace, both transparently and publicly, how vessels are adopting practices in favour of sustainable fishing;
- → The limitation of fishing capacity permitting ISSF members to only make their tuna purchases from large Purse Seiners that are either already operative or in the process of being built at 31/12/2012;
- → A commitment to only make purchases from vessels with an IMO (International Maritime Organization), UVI (Unique Vessel Identifier) or TUVI (Tuna Unique Vessel Identifier) identification number.
- http://iss-foundation.org/
- http://iss-foundation.org/knowledge-tools/publicationspresentations/conservation-measures-commitments/





The identification numbers issued by the *International Maritime Organization* (IMO) allow for the identification of any vessel authorized to fish on a global level. Vessels are assigned a Unique Identification Code (UVI) that also ensures traceability and monitoring by third party bodies. Lastly, the TUVI (*Tuna Unique Vessel Identifier*) is registered in the *Consolidated List of Authorized Vessels* (CLAV).

IUU - *Illegal*, *Unreported*, *Unregulated Fishing* includes all fishing activities that are either conducted without a regular license or that violate the regulations established at national, regional, community or international level. This type of fishing causes damage from an environmental, economic and social point of view

because it depletes fish stocks, distorts competition and is associated with the violation of the social and human rights of workers. According to the EU, approximately 20% of the value of fish caught every year on a global level is attributable to illegal fishing practices, for an estimated value of approximately ten billion Euros⁸.

The *Regional Fisheries Management Organizations* (RFMO) are multi-lateral institutions created by governments to promote the conservation and management of tuna stocks in oceans. RFMOs avail themselves of scientific committees to define the measures and recommendations that need to be adopted for ecosystem sustainability.

The ISSF is categorized by a model that involves all supply chain players. Its organizational structure includes a board and two committees: the *Scientific Advisory Committee*, which comprises the world's leading scientists and marine biologists, and the *Environmental Stakeholder Committee*, which comprises expert representatives from conservation and environmental organizations.

In addition to the above, the ISSF has an Implementation Team, a work group that, as its name suggests, is charged with working with the stakeholders who are involved to implement Board decisions and provide feedback and guidelines based on the decisions and recommendations set out by internal committees.

The ISSF works in close contact with the *International Seafood Sustainability Association* (ISSA), whose members are tuna processors, brokers and distributors who, by virtue of their membership, agree to comply with the resolutions issued by the ISSF.

Found to be compliant in the 2017 audit, Bolton Alimentari is a participating member of ISSA through

several of its managers, whose task is to propose the ISSF agenda by facilitating the exchange of opinions and information. Proof of Bolton Alimentari's involvement in these two organizations was the appointment of Bolton Alimentari's *Sustainable Development Director* as Chairman of the Board of Directors of ISSA and ISSF; a prestigious appointment that testifies to the company's commitment to sustainable fishing.



 European Commission, "Tackling illegal, unreported and unregulated (IUU) fishing", 2015.



Results to-date:

One of the main results achieved by the ISSF in relation



to conservation is **training fishermen to** reduce bycatch, an activity that involved more than 1,200 individuals in 2017.

Another crucial activity is the adoption of measures to improve transparency and traceability, key elements to guarantee that conservation measures are applied effectively. With regard to the above, an increase in



vessels registered in the PVR was noted over the past few years. In March 2018, this figure accounted for almost 1,000 units, of which approximately 600 are

purse seiners. Transparency is also key to evaluating the commitments undertaken by companies to comply with the conservation measures proposed by the ISSF. With regard to the above, the ISSF Annual Conservation Measures & Commitments Compliance Report, a report pertaining to 22 conservation measures, shows a conformance rate of 97.5% among the 27



ISSF participating companies, with all 22 conservation measures in effect during the audit period, compared to 79.8% in June 2015.

The ISSF is also committed to the implementation of awareness activities targeted at Regional Fisheries Management Organizations (RFMO), multi-lateral institutions created by governments to promote the correct management of tuna stocks in oceans, and at member states of the RFMOs. The aim of these actions is to encourage the adoption of policies designed to create positive changes in tuna management on a global level. Advocacy activities are also directed at other subjects, including large-scale-retail-trade, with the aim of increasing the sustainability level of the offer. Apropos



of the above, to-date 6 global retailers out of 10 have adopted the recommendations outlined by the ISSF in their tuna purchasing policy.

Tri Marine: our strategic supplier

Founded in Singapore in 1972, Tri Marine is a company working with leading global tuna brands, supplying them with raw materials and providing them with business-related services. This also entails helping companies working in the industry to guarantee the sustainability of tuna as a natural resource.

For more than 20 years, Bolton Alimentari has worked in close collaboration with Tri Marine, the **exclusive supplier of the tuna loins** processed at the Cermenate plant. This relationship has been further strengthened by Bolton Group's significant shareholdings in Tri Marine.

Guided by shared values and the same long-term vision of sustainability, we collaborate with Tri Marine on various projects regarding social issues and sustainability, in particular:

→ a traceability system that links our products to vessels;



- → the implementation of ISSF conservation measures;
- → the development of conduct codes (Seafood Taskforce Code) and standards pertaining to Human Rights;
- the support of initiatives aimed at achieving and maintaining MSC certification, including the AP2HI and other FIPs in Indonesia and the fishery of the Solomon Islands;
- → the promotion and support of other initiatives, including the Global Ghost Gear Initiative aimed at the recovery of fishing gear and abandoned FADs.







Our partnership with the WWF

Over the past four years our efforts regarding sustainable fishing have resulted in the implementation of additional improvements to the *Right Course* plotted in our previous Socio-Environmental Report.

In December 2016, we signed a partnership agreement on the responsible procurement of fish resources with WWF Italia and WWF International. This partnership, whose establishment was announced in several European countries during the course of 2017, involves all our brands (Rio Mare, Palmera and Saupiquet) and all our procurements. Our collaboration with WWF is based on a series of criteria and objectives that, in accordance with those of the ISSF, are aimed at promoting sustainable fishing practices and protecting the marine ecosystem.

The objectives of this partnership include:

Increasing the procurement and production of sustainable products:

- → By 2024, 100% of our tuna procurements will be sourced from MSC (*Marine* Stewardship Council) certified fisheries or from fisheries taking part in credible, robust Fishery Improvement Projects - FIPs;
- → By 2024, 100% of the other fish species procured (salmon, mackerel and sardines) will come from MSC/ASC (Aquaculture Stewardship Council) fishing activities or from FIP/Aquaculture Improvement Projects - AIPs.

2. Traceability:

- Traceability for all vessels that supply Bolton Alimentari with tuna;
- → The same principles of transparency and traceability developed for tuna will also apply to all other fish species.

3. Human rights:

- → Development of a credible Human Rights Policy aligned with international best practices;
- → Inclusion of the Human Rights Policy in Bolton Alimentari's management system and in the company's sustainability report.

WWF and Bolton Alimentari will work together to raise awareness among all players in the industry - from suppliers to consumers - about issues related to sustainable fishing.

The objectives of this partnership are both ambitious and challenging. The procedure to achieve 100% MSC



certified fish or fish from robust FIPs is long and complex, given that, **to-date**, **the percentage of MSC certified tuna on a global level accounts for 18%**, **depending on the species**

fished. Thanks to our partnership with the WWF, the achievement of MSC certification by the Solomon Islands and Saupiquet's commitment to an FIP in the Eastern Atlantic, we believe that over the next few years, we will be able to rapidly increase the percentage of raw materials in our portfolio procured from MSC certified fishing activities: a pledge that we announced in October during the 2017 Malta Ocean Conference attended by members of the WWF and leading industry members in the sector.



WORKING TOGETHER FOR SUSTAINABLE FISHERIES





Results to-date:



At the end of 2017, 52.4% of Bolton Alimentari tuna was sourced from MSC certified fisheries (12.9%) or from fisheries participating in credible, robust Fishery Improvement Projects - FIPs (39.5%).

Fishery status⁹

Fishery	Status	FAO AREA
Solomon Islands	MSC certified	71
TUNACONS	Robust FIP	87-77
SIOTI	Robust FIP	51-57
OPAGAC	Robust FIP	71-77-87-31-34-51-57

9) www.fisheryprogress.org



MSC Fishery on the Solomon Islands

The Solomon Islands' project related to sustainable fishing is one of our most successful achievements to-



date. In 2016, thanks to the support of Tri Marine, our exclusive tuna supplier, we managed to **obtain MSC certification for the Solomon Islands' fishery.**

Additionally, over the past few years, our activities in the Solomon Islands have included the successful implementation of social projects designed to benefit the communities working in our supply chain. In particular, we updated and modernized the fleet of local vessels in Noro.

Fishery Improvement Project in the Eastern Pacific Ocean (TUNACONS)

This project involves the participation of various players involved in fishing activities in the area; they are all committed to reducing the environmental impact of their activities to support sustainable fishing in the region.



The project involves 45 Purse Seiners which represent 18% of the fleet operating in the region. The FIP is managed by the *Tuna Conservation Group* (TUNACONS)

in partnership with WWF Ecuador and the support of Ecuador's Ministry of Aquaculture and Fishing, the National Fisheries Institute, EPESPO and CIAT, as well as other experts involved in the management of fishing activities. TUNACONS, a group comprising leading tuna companies operating in the area (Negocios Industriales Real NIRSA, Eurofish, Grupo Jadran, Servigroup and Tri Marine), was established with the aim of launching a robust Fishery Improvement project geared towards

obtaining MSC certification. Tri-Marine is the main supplier of Bolton Alimentari's *loins*, meaning that its participation in the project will enable our company to maintain the commitments undertaken.

The WWF is a key partner in the development of this project. During the initial stages, it contributed to the constitution of a work group, facilitating the meeting and cooperation of the parties involved. NIRSA, which initiated the process with a pre-assessment of the area of fishing activity, was a pioneer of this initiative together with Eurofish and Jadran. Subsequently and also thanks to the work of the WWF, new players joined the team, including Tri Marine and Servigroup, one of most important companies in the Ecuadorian fishing industry.

More specifically, the WWF undertook to coordinate the annual revision process of the FIP with the choice of an independent consultant who conducted an audit and drafted an analysis of the results achieved during the first year.

In a broader sense, WWF supports FIPs with its expertise and knowledge of the marine world by promoting the governance policies of sustainable fishing on a national and regional level.

In light of the commitment assumed through this partnership, thanks to a designated budget, Bolton Alimentari helps to fund WWF's work and its development of several specific activities in the area.

Thanks to this initiative, TUNACONS is becoming a business model for companies operating in the fish sector worldwide. This shows how the private sector, by working synergically with the public sector and civil society organizations, manages to work in favour of actions aimed at the conservation of marine species and their ecosystems.

WWF

The **World Wildlife Fund (WWF)** is the world's leading independent conservation organization. The organization



is present in more than **100 countries** in **six continents** and is supported by more than five million people who enable it to conduct over **1,300 projects in defense of the habitat and endangered species**, from Italy to the Arctic and from Africa to China.

The WWF's mission is to reduce the most pressing threats to our planet and build a future where people can live in harmony with nature by promoting the conservation of the genetic diversity of species and the ecosystem, the sustainable use of natural resources and the reduction of pollution and anthropic impacts. More information on wwf.it

Main sustainability certifications across the fish supply chain

Marine Stewardship Council (MSC) certification

The Marine Stewardship Council (MSC) is a **global**, **voluntary and independent body** that supports sustainable fishing practices and defines the standards for the responsible procurement of fish resources. In particular, MSC guarantees that fishing activities are conducted according to three key standards:

- → Fishing must leave enough fish in the ocean to ensure that the health of stocks is maintained, and that fishing can continue indefinitely;
- → Fishing activity must be managed carefully to minimize its impact on the marine ecosystem, allowing marine plants and animals to prosper;
- → Fishing must be responsibly managed by companies and be able to adapt to changing environmental circumstances in compliance with the national and international laws in force.

The MSC chain of custody **guarantees complete traceability 'from boat to shelf'**, considerably reducing the probability of illegal fishing (IUU – *Illegal*, *Unreported and Unregulated*).

Acquaculture Stewardship Council (ASC) certification

Fishing and protection of the marine eco-system

Founded in 2010 by the WWF and the IDH (*Dutch Sustainable Trade Initiative*), the *Aquaculture Stewardship Council* (ASC) is an **independent, non-profit organization that operates on an international level**. ASC aims to be the **world's leading certification and labeling program for responsible aquaculture**. ASC's primary role is to manage the global standards for responsible aquaculture, which were developed by the WWF Aquaculture Dialogues. ASC works with aquaculture producers, seafood processors, retail and foodservice companies, scientists, conservation groups

 Reward companies adopting responsible aquaculture practices through its certification program and seafood label;

and consumers to:

- → Promote best environmental and social choices when buying seafood;
- Contribute to the responsible transformation of seafood markets.





Fishery Improvement Projects - FIPs

FIPs (fishery improvement projects) are **multistakeholder initiatives aimed at improving fishing practices and the management of fisheries** to help them meet the requirements of the Marine Stewardship Council (MSC) standard.

The main stakeholders of FIPs include fishermen/ vessel owners, non-governmental organizations (NGOs), government authorities, researchers and other members of the fishing industry.

A FIP can be defined as robust and credible when all of the following criteria are met:

- → The drafting of a project objectives document,
- → An initial gap analysis against the MSC Standard (MSC pre-assessment) conducted by an independent third-party body, the definition of a plan of action and a budget inclusive of the resources required for the development of said plan of action, to be implemented within a fiveyear period,
- Presence of an independent system to monitor progress, and the signing of a memorandum of understanding that formally binds all players involved.

FIPs are progressive improvement projects designed to ensure that fisheries obtain specific results, within a specific time frame, amending any gaps in order to respect the standards stipulated by MSC certification.

Bolton Alimentari and its suppliers are engaged in developing several important FIPS aimed at guaranteeing the achievement of 100% procurement from MSC certified fisheries or fisheries involved in robust, credible FIPs by 2024.

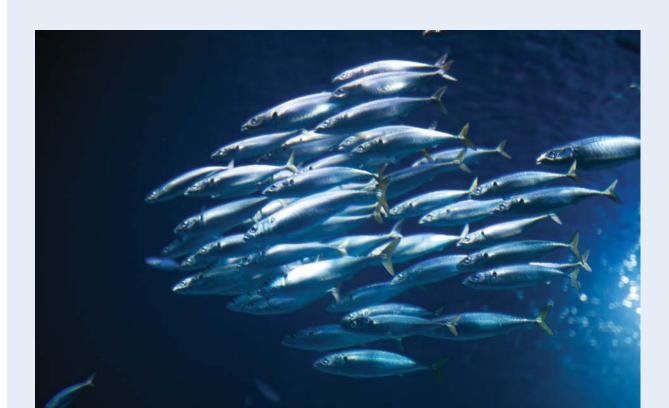
In particular, in 2016, the FIP of the Solomon Islands obtained MSC certification. At present, we are focusing on the development of a FIP in Ecuador.

Aquaculture Improvement Projects - AIPs

An Aquaculture Improvement Project (AIP) is an alliance between aquaculture companies, fish processors, NGOs and other stakeholders working together to improve the sustainability of aquaculture practices and reduce the impact that aquatic farming has on the marine habitat and the fauna living beneath it.

Thanks to the responsible procurement of farmed fish products and the adoption of supply policies that encourage improvement of farming conditions, the food industry can obtain several important results. These include ensuring that fish farms source feed from sustainable fishing areas, promote a more efficient use of energy and water resources and, lastly promote better health and biodiversity in the aquatic habitats of aquaculture.

Additionally, the aim of AIPs is to support farms to obtain ASC certification, the most credible and authoritative labeling program for responsible aquaculture.



Diversification of methods, species and fishing oceans

To guarantee the balance of resources, we have adopted a procurement policy that includes the diversification of fishing methods, of tuna species and the oceans in which we fish.

DIVERSIFICATION OF FISHING METHODS

For some time now, in order to better balance environmental, social and economic sustainability, we have implemented a diversification policy regarding the fishing methods used. In order to achieve this, we carefully assess various factors, including for example, the environmental impact generated by the fuels consumed for each ton fished, the risk of bycatch of other marine species, the working conditions of fishermen, safe sanitation and food hygiene and the marketing of an affordable, high-quality product. This explains why our tuna comes from Purse Seiners, using FAD or Free Schools or Pole & Line.

To this end, we have invested in: the development of traditional fishing methods with a reduced risk of bycatch such as **Pole & Line fishing** which **accounts for 10% of our procurements** in order to support artisanal fishing supply chains involving fishing from small boats measuring less than 100 GT (gross tonnage) and an increase in free school fishing and from MSC-certified supply chains or involved in robust FIP (*Fishery Improvement Projects*).



Furthermore, Purse Seine fishing is only made from vessels registered in the PVR (*Proactive Vessel*

Register), that comply with ISSF

indications for sustainable fishing and undergo annual audits by third parties to check compliance with these indications. The PVR is used as a tool to verify good practices, including training skippers about sustainable fishing, the presence of on-board observers to monitor fishing operations and the use of *Non-entangling* FADs.



28%

Of **our procurements** are made using fishing methods with a reduced risk of bycatch

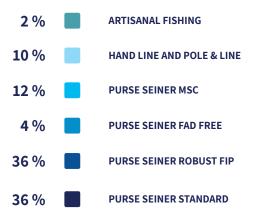


100%

Of the **Purse Seiners** from which we make purchases are registered in the PVR

OUR FISHING METHODS 2017 (%)





Our fishing methods

Purse Seiner

A fishing method involving the use of large fishing boats capable of staying at sea for several weeks. Once a tuna school has been sighted, a small boat, known as a skiff, with a large nylon net attached, is lowered into the sea. The fishing boat makes a circular manoeuvre to join the two ends of the net and draws it tight at the bottom to form a purse, referred to as a seiner. The tuna caught are immediately frozen in refrigerators situated below deck. Purse Seiner vessels fish either by spotting free-swimming schools of tuna or by utilizing FADS (Fishing Aggregating Device).

Pros: The entire operation takes place on a single vessel, guaranteeing improved traceability and hygiene, preventing sanitation risks for the catch and guaranteeing better working conditions for the fishermen. This method also involves a lower incidence of fuel consumption per ton of fish caught, thus guaranteeing reduced environmental impact compared to other fishing methods.

Cons: The incidence of bycatch is lower compared to other fishing methods. On average it represents 5% of the total caught, approximately 80% of which are not at risk of extinction (ISSF).

About FADs (Fishing Aggregating Devices)

Fishing Aggregating Devices are rafts with transceivers that are deployed in the ocean prior to fishing so that conditions capable of attracting schools of fish in search of food are recreated underneath them. This technique is the result of observations made by fishermen who noticed the natural tendency of fish to gather beneath logs of wood or other floating objects. Since this technique provides skippers with information regarding the localization and number of fish that have gathered beneath these objects, it is used to maximize fishing.

FADs can either be anchored to the ocean floor (anchored FADs) or drift freely in the open ocean by following the currents (drifting FADs).

Pros: By encouraging the aggregation of tuna underneath them, the use of FADs increases the catch per unit of effort. This method means that the tuna are easier to track in the open sea with a lower fuel consumption.

Cons: One of the main problems linked to the use of FADs is the bycatch of other species, which can be entangled in the FADs. To reduce this phenomenon, the ISSF has conducted numerous studies over the past few years to optimize their design, improving handling and use and limiting environmental impact through the use of biodegradable materials (biodegradable FADs).





About Free FADs

This is a selective fishing method that exploits the natural tendency of migratory tuna to aggregate in schools and is based on skippers' ability to identify tuna schools in the open sea without using fish aggregating devices (FADs).

Pros: Reduced risk of bycatch because it prevents the aggregation of other species associated with the use of FADs.

Cons: Increased fuel consumption because skippers have to spend more time at sea looking for the tuna schools.

Pole & Line

A traditional fishing method practiced just a short distance from the coastline. The fishermen throw small bait into the water to attract the tuna; with the help of water sprayed with pressure hoses, small swirls, which disorientate the fish, are created. When the tuna are in a feeding frenzy, the fishermen use their poles with lines and special hooks to bait them. Once hooked, the tuna are hauled onboard and rapidly preserved in ice or frozen.

Pros: the risk of bycatch is reduced to a minimum because the fish are caught one by one.

Cons: Use of live bait like sardines and other small local fish, involving the risk of impacts on their stocks if not correctly handled. Given the reduced number of fish caught, vessels tend to consume more fuel per ton of fish caught. Lastly, this method is physically harder for the fishermen involved.

Fishing methods that we do not use

Long Liner

A fishing method used to capture those fish that do not normally live in schools, like, for example, white tuna. It involves setting cables in the water from which hang baited hooks that are deployed in the ocean until the fish bite.

Driftnet

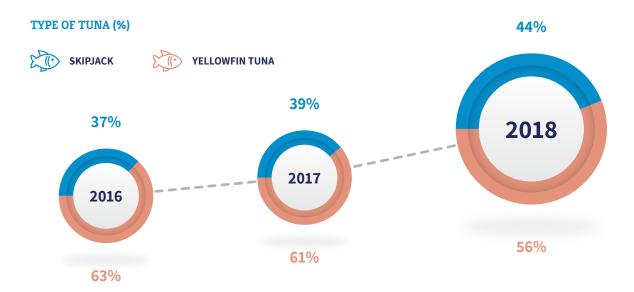
A fishing technique in which the nets, referred to as "drift nets", hang vertically in the water without being anchored to the ocean floor.

Fishing and protection of the marine eco-system

DIVERSIFICATION OF TUNA SPECIES

Tuna is a migratory species and is mainly fished in oceanic waters between the Tropics of Cancer and Capricorn. Eighty six percent¹⁰ of the tuna caught is constituted by two species: Yellowfin (*Thunnus albacares*) and Skipjack (*Katsuwonus pelamis*). According to most recent ISSF stock assessment, 78%¹¹ of the tuna stocks enjoy good health.

To protect the balance of the marine ecosystem, we decided over time to gradually diversify the tuna species fished. This was achieved by reducing catches of Yellowfin tuna from 100% to 56% thanks to the introduction of Skipjack, which now accounts for 44% of our supplies. We have made a commitment not to purchase or market either endangered species or species at risk of extinction, for example, red tuna (*Thunnus thynnus*).

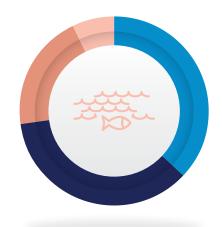


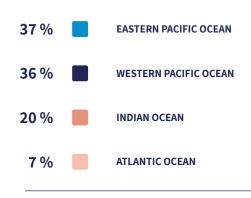
DIVERSIFICATION OF FISHING ZONES

Our sourcing policy is based on ISSF indications and all fleets supplying us with raw materials respect the 'closed-to-fishing' periods indicated by the RFMOs, in order to guarantee that tuna schools have adequate time to reproduce and repopulate. Most of our raw materials are

sourced from the West Pacific Ocean (36%), which has the lowest incidence of bycatch compared to other oceans, from the East Pacific Ocean (37%), from the Indian Ocean (20%) and from the Atlantic Ocean (7%).

OUR PROCUREMENT AREAS 2017 (%)





- $10) \qquad http://iss-foundation.org/about-tuna/status-of-the-stocks/\\$
- 11) http://iss-foundation.org/about-tuna/status-of-the-stocks/

WHO WE ARE

Our best practices

Tuna Supply Policy

To encourage maximum transparency across the supply chain, we have adopted a *Tuna Supply Policy* that outlines the principles and best practices which must be met by all of our suppliers, not only as regards sustainable fishing, but also the fundamental human rights of those operating in the fishing industry (convention ILO C188).

ISSF's Proactive Vessel Register (PVR)

We supported the creation of the *ProActive Vessel Register* (PVR), a register instituted by ISSF to identify and trace, both transparently and publicly, vessels adopting practices in favour of sustainable fishing. This register is also promoted in the guidelines of WWF International for the sustainable sourcing of tuna and stipulates that registered vessels must undergo annual audits by a third, independent party (MRAG) which verifies compliance with ISSF conservation measures. All vessels owned by us are registered in the PVR and we are committed to only making purchases from suppliers who use tuna fished by Purse Seiners listed in this register.

The 10 measures related to sustainable fishing for a PVR registered vessel include the following:

- the UVI number of a vessel must meet the requirements implemented by the ISSF regarding vessel type and size,
- 2. it must be authorized to fish in regions that are

- currently active,
- **3.** it must be flagged to a member nation or an RFMO cooperative non-member nation,
- it must not be listed in any RMO list of vessels that practice illegal fishing,
- the vessel owner must have published a policy prohibiting shark finning and the vessel must not have a recent shark finning finding,
- **6.** it must be able to prove 100% observer coverage, either human or electronic,
- 7. full tuna conservation on board (Skipjack, Yellowfin and Big-eye tuna), to avoid fish from being discarded,
- 8. it must have an ISSF-trained skipper, either via an in-person Skipper Workshop on best practices or via having watched a video or read a book regarding ISSF best practices,
- it must not use large driftnets
- **10.** established and published company policy on non-entangling FADs.

Limitation of fishing capacity

We comply with the ISSF resolution aimed at establishing a limited, controlled number of vessels, and are therefore committed to only purchasing our fish from vessels already active or under construction at 31/12/2012. We are in favour of limiting and regulating the use of FADs.



Against illegal fishing

To combat the phenomenon of illegal fishing, we ask all our suppliers to refrain from any transaction with vessels not listed in the register of authorized vessels by the *Regional Fisheries Management Organizations* (RFMO), or not in possession of an identification number issued by the *International Maritime Organization* (IMO).

We guarantee complete traceability of our product. We do not make purchases from vessels registered by the EU in the IUU List, preferring rather to source tuna from vessels regularly registered with the *RFMOs*. To guarantee maximum traceability of our products and ensure widespread controls across the entire supply chain we ask our suppliers to refrain from conducting any type of transaction with boats practicing transshipment, i.e. the transfer of fish caught in the open seas, unless specifically authorized by the RFMOs or controlled by on-board observers.

Our commitment to reducing bycatch

Since 1992, we have endorsed the *Dolphin Safe program instituted by the Earth Island Institute* (EII), which has **reduced Dolphin mortality by as much as 98%** to-date. We ask our suppliers to guarantee that they do not engage in the practice of *shark finning*. Additionally, as outlined in the ISSF's conservation measures, we have pledged to only make purchases from suppliers that use non-entangling FADs on their vessels, which, as opposed to traditional FADs, guarantee a lower risk of bycatch. This commitment is also specified in our Tuna Policy which must be signed and respected by all our partners.

Non-entangling FADs:

Non-entangling FADs are aggregating devices that are constructed with no netting material to minimize 'ghost fishing', i.e. when fauna, primarily sharks and

turtles, despite not being the target species of the fishing expedition become entangled and trapped. For a FAD to be completely non entangling, it must use no netting materials either in the surface structure or the submerged structure. Some organizations also consider NEFADs to be those using netting but built to minimize entanglement. In this case they are sometimes called 'lower entanglement risk FADs'.

Bycatch

The incidental capture of fish, also known as bycatch, refers to non-targeted marine animals during fishing. Furthermore, the term bycatch also applies to anything that is caught and then thrown back into the sea, including targeted fish that are discarded due to undesired quality or size, or anything that is caught and taken back to port which though destined for a local market was not the target of the fishing trip. All fishing methods have some level of environmental impact and this impact is often measured in terms of fishing mortality of non-target species. Among the marine species, the most frequent victims of bycatch are sharks, rays and sea turtles.

Support of Protected Marine Areas

To protect the marine eco-system, we have committed to not purchasing fish from either protected marine areas of marine reserves identified by the coastal states or the RFMO's, including the four marine reserves of the Central-Western Pacific. Furthermore, to protect biodiversity we support the creation of new marine reserves as well as existing ones, such as the Protected Marine Area of the Aegadian Islands, the largest in Europe.

Rio Mare for the Aegadian Islands

In September 2014, we signed a partnership with the Protected Marine Area of the Aegadian Islands (Sicily), the largest

protected marine area in Europe and among Italy's most uncontaminated. This agreement is aimed at protecting biodiversity and encouraging the sustainable management of the area's natural resources. We decided to launch this partnership, primarily for three reasons: because, as far as we are concerned, supporting Protected Marine Areas and protecting biodiversity are strategic activities; because we believe that it is important to protect the beauty of our country and maximize Italian excellence; because one of the objectives of the projects implemented in partnership with the Protected Marine Area of the Aegadian Islands aims to combat illegal fishing, which we also oppose in our procurement areas.

Our collaboration consists in the support and funding of three projects:



The MASTER project (Anti-Bottom Trawl Measures for Protection and Repopulation) was created to prevent bottom trawl fishing along the coast of the Protected Marine Area, to increase fish



fauna and to protect Posidonia Oceanica, a marine phanerogam¹² that grows on sandy and rocky sea beds creating an underwater habitat offering refuge and food to numerous species. In addition to acting as a 'nursery'

and a means of repopulation for marine fauna, Posidonia helps preventing coastal erosion and combats climate changes and global warming, producing 2.5 times more oxygen than that produced by the Amazonian forests in proportion to their extension and absorbing large amounts of CO₂. In order to protect this marine area from illegal trawl fishing, anti-trawl concrete blocks, also known as 'bollards' are deployed on the sea bed of the area involved. To protect the entire area, in addition to the 72 bollards funded by the Ministry of the Environment, we financed the deployment of an additional 40 bollards. The first results showed an 80% reduction of illegal trawl fishing in the coastal area surrounding the Aegadian Islands.

12) Phanerogams are marine plants with visible, differentiated reproductive organs, enclosed in a flower.



WHO WE ARE

SUSTAINABILITY

FISHING

PRODUCTION

PEOPL

NUTRITION





→ Management of the Foca Monaca Observatory in Castello di Punta Troia a

Marettimo. The second project, conducted in partnership with the researchers of the Higher Institute for Environmental Protection and Research (ISPRA), involves management of the Foca Monaca Observatory in Castello di Punta Troia a Marettimo. Its objective is to monitor the presence of Foca Monica, one of the world's most protected species. In 2016, thanks to one of the photo traps installed and funded by our company, a specimen of Foca Monaca was sighted in a grotto of the Aegadian Islands.

→ Management and improvement of the Recovery Centre for sea turtles in Favignana. The third project involved management of the Recovery Centre of sea

turtles in Favignana, the first in Western Sicily. The aim of the centre is to rescue and recover wounded or distressed specimens that are housed in special baths before being treated and set free at the end of their convalescence. In addition to having an educational function, the complex acts as a visitor centre for tourists.

In 2017, 17 specimens of Caretta caretta (or Loggerhead) turtles, were rescued and treated at the centre, accounting for a total of 32 specimens rescued since 2015.

To support these three projects, we developed a series of promotional activities at several sales points, whose aim was to donate useful working tools to the Protected Marine Area, including a recovery bath for sea turtles, a turtle ambulance to rescue them and a classroom.



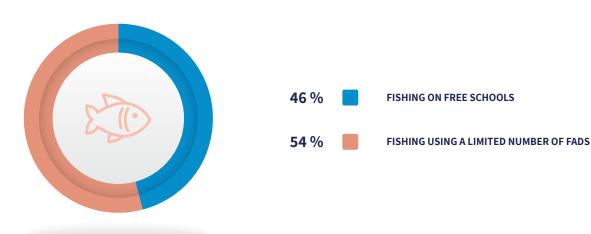
Our Purse Seiners flying the French flag use highly selective techniques. These include fishing methods, environmental protection, on-board safety and traceability.

The French Purse Seiners are all **registered** in the **PVR**. They participate in Fishing Improvement Projects (FIPs) and 46% of their catch is free school-fished. For the remaining 54%, they use a limited number of **FADs**. Moreover, to guarantee environmental protection, they enforce stringent rules regarding emissions, waste and the use of drinking water.

Their vessels are subjected to periodic controls by French authorities to verify compliance with regulations pertaining to safety, fire prevention, hygiene and onboard living conditions. These controls, combined with fishing expeditions that do not last longer than 45 days, guarantee the protection of the rights of those working on the fishing vessels.

The vessels are equipped with on-board electronic systems to monitor daily fishing activities, including, in particular, species and catch area, thereby guarantee product traceability from catch to consumer.

The adoption of all these practices means that our fleet is recognized as a 'Best in Class' in the sector.





Fishing and protection of the marine eco-system

From sea to consumer: the cornerstone of the supply chain

The tuna that we use for our products embarks on a long journey before reaching the tables of our consumers. The nature of the tuna supply chain is long and complex. It begins in the tropics where the fish is caught and ends in Cermenate, in the province of Como, where our production plant is headquartered - the largest and most technologically advanced plant in Europe and among the first in the world for canned fish.

The tuna destined for canning lives in equatorial waters between the two tropics. Approximately 72%¹³ of the tuna fished on a global level comes from the Western Pacific Ocean. Furthermore, in order to guarantee maximum safety and hygiene, the majority of the vessels used for fishing are equipped to freeze the freshly caught tuna.

As soon as it is offloaded, the first processing stage of the tuna takes place at processing plants located near the fishing zones. The fish are frozen, their heads and tails are removed, and they are then cooked, cleaned and sliced into tuna loins which will be sent to the Cermenate plant for canning.

The production process at Cermenate is rapid. In a matter of just 6 hours, the tuna loins are defrosted and canned with the addition of several different ingredients. After being hermetically sealed, the cans are sterilized, packaged and sent to the warehouse. More than 84% of our products, sold in 45 countries are manufactured at this plant which boasts a production capacity of up to three million cans a day.

Products having a strong artisanal component, such as our tuna fillets, are canned directly at our plants located near the fishing zones and then sent to the Cermenate warehouse, ready to be sold worldwide.

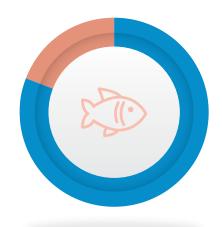
Our salmon fillets are also processed in Cermenate, while our mackerel and sardine fillets are mainly manufactured at our French Quimper plant.

MSC certified mackerel, equal to 81% of our total mackerel procurement, is fished in the North Eastern Atlantic. After undergoing a first processing procedure, it is frozen at the processing plants located near the fishing zones (Scotland, Ireland, Faroe and Iceland). The remaining 19% of mackerel comes from the Central-Eastern Atlantic (Morocco).

As for sardines, 86% of the sardines processed at the Quimper plant come from the Central-Eastern Atlantic (frozen), while the remaining 14% come from the North-Eastern Atlantic.

The Quimper plant produces **70 million cans of mackerel** and approximately **9 million cans of sardines** a year. Tuna-based products marketed under the Saupiquet brand are manufactured by strategic suppliers on the Ivory Coast, Spain and Ecuador.

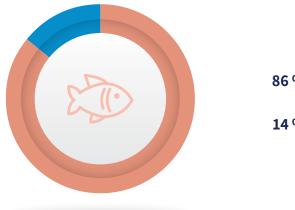
MACKEREL BY ORIGIN AND MSC CERTIFICATION







SARDINES BY ORIGIN AND MSC CERTIFICATION



86 % **CENTRAL-EASTERN ATLANTIC**

14%

NORTH-EASTERN ATLANTIC (MSC CERTIFIED)

> NB This data only refers to sardines processed at the Quimper plant.

Traceability of the raw materials

In a long and complex supply chain like ours, traceability is crucial. Not only does it guarantee the food safety of the products that reach the tables of consumers, but it also promotes protection of the marine ecosystem. Traceability is one of the main tools used to combat illegal fishing, promote the sustainable management of fishing zones and the governance of our sustainability policies.

For this reason, in 2015, we were the first Italian company and among the first in the world to obtain international ISO 22005 certification of our traceability system from DNV-GL (Traceability System in the feed and food chains). This certification enables us to monitor a complex supply chain like that of tuna.

This important project, one of the most avant garde in the canning industry, involves more than 500 products on 10 production lines, allowing us to reconstruct the story of each can and cross-reference data, analyses and controls across the entire supply chain. Thanks to an IT system, developed internally and validated by an external body, we are able to check and screen all our suppliers globally, in real-time, rapidly monitoring and controlling procurement data, including those related to the diversification of the fishing methods used, tuna species and fishing zones. In addition, this certification allows us to provide consumers who access the Rio Mare and Saupiquet websites to request information, with detailed information certified by an independent third-party body which guarantees its authenticity and reliability.



Fishing and protection of the marine eco-system

Our traceability system and the Suppliers' Workplace

The traceability systems of the tuna supply chain and all Bolton Alimentari production sites are certified in conformity with the **ISO 22005** standard: this guarantees the availability, accuracy and reliability of information related to the origin of tuna across the supply chain.

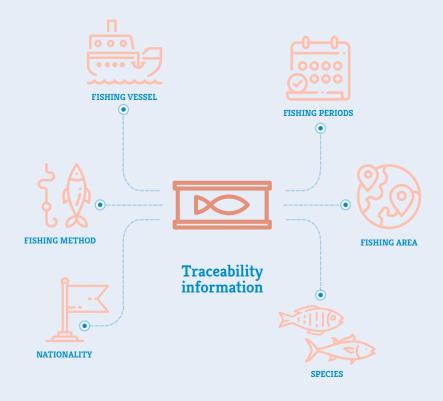
Thanks to this website, all those who might be interested, including end consumers, can request specific information regarding the traceability of the tuna contained in each single can, including fishing data (e.g. name and nationality of the vessel, ocean, area, method and period of fishing).

Furthermore, the traceability system helps the company to manage and achieve objectives related to food quality and safety and to manage eventual product non-conformity, including possible situations in which it becomes necessary to withdraw or recall a product from the market.

In order to share information and documents with suppliers, we use an IT system known as the "Suppliers' Workplace". This Portal is used to provide our suppliers with all documents requiring formal acceptance, enabling us to collect traceability data from them, including:

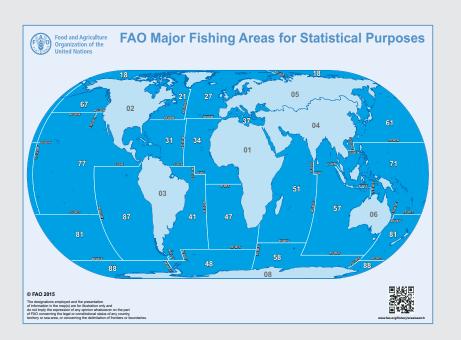
- → The name of the fishing vessel;
- → Registration in the PVR (Proactive Vessel Register) register for Purse Seiner vessels;
- → IMO Number;
- Ocean of origin;
- → FAO areas;
- → Additional information about fishing areas, i.e. whether this is an MSC (Marine Stewardship Council) certified area, Fishery Improvement Projects (FIPs) or standard;
- → Fishing period;
- → Fishing method;
- Port of landing.

Additionally, this tool enables us to share data obtained by suppliers and related to various procurement stages, with all corporate stakeholders, affording us the possibility of evaluating conformity of the latter with our Policies and the laws in force.



FAO

The Food and Agriculture Organization (FAO) is a specialized agency of the United Nations that deals with agriculture and food production, especially as regards developing countries. The FAO's objective is to promote more efficient agricultural practices and combat various types of natural disasters. In order to simplify the identification of fish catches for statistical purposes, the FAO has divided the world's oceans into 27 fishing areas.14



Mackerel, Sardines and Salmon

In addition to tuna, our company is present in the canned salmon, mackerel and sardine market. The variety of mackerel procured by us includes **Scomber japonicus colias** originating mainly from Morocco and **Scomber scombrus** fished in Northern European waters. Globally, 80% of our mackerel is sourced from MSC-certified suppliers and approximately 98% of Scomber scombrus species are procured from MSC certified suppliers.

At the beginning of 2017, we outlined our mackerel purchasing policy (Mackerel Policy), a policy that is currently in the process of being adopted by our suppliers. This document outlines the principles of sustainable fishing with which suppliers must comply.

The sardines that we use for our products belong to the **Sardina pilchardus** species and are fished off the coasts of Britain to North Africa.

The salmon that we use belongs to two different species, *Salmo salar* and *Oncorhynchus gorbuscha*. The former comes from aquaculture in the waters of Chile and Norway, while the latter is fished in Canada and Alaska in compliance with fishing quotas which are continuously monitored by competent territorial authorities.

Furthermore, we will also publish a policy related to the purchase of sardines and salmon, which we are in the process of drawing up with WWF based on our partnership agreement. This policy will include all the principles and commitments to which our suppliers must subscribe in order to guarantee sustainable farming and fishing and full traceability across the supply chain.

http://www.fao.org/fishery/area/search



Fishing and protection of the marine eco-system



Our commitment to the adoption and promotion of sustainable fishing



Preserve and improve the health of oceans and fish stocks

SUSTAINABLE FISHERIES:

- → **By 2024:** 100% of our tuna sourced from MSC certified fisheries or Robust Fishery Improvement Projects (Robust FIPs);
- → **By 2024:** 100% of the other species (Salmon, Mackerel and Sardines) sourced from MSC/ASC certified fisheries or Robust Fishery/Aquaculture Improvement Projects (Robust FIPs/AIPs).

SUSTAINABLE FISHING METHODS:

- → **By 2020:** 50% of tuna procurement from more selective fishing methods with a lower level of by-catch and environmental impact (Pole & Line, hand line, Small-scale sustainable vessels*, FAD-free purse seine).
- → **By 2020:** 50% of tuna procurement from large scale purse seiner with FAD management measures in place:
 - → Only non-entangling FADs (in compliance with ISSF guidelines);
 - → Maximum 300 active drifting FAD per vessel and per ocean, without increasing them where the number of FAD used was less than 300;
 - → Communication of catch data to RFMOs, including data related to the use of FADs, within 4 months.
- → By 2019: we will finalize an analysis to better quantify the number of FAD used by the vessels we procure from and to identify additional measures, such as limits on the number of FAD sets, targets for biodegradable FADs, supply vessels management by 2020.
- → By 2018: for Bolton-owned vessels:
 - → Continue to prohibit the use of supply vessels;
 - → Max 150 active FADs for the Atlantic Ocean (Saupiquet) and max 300 active FADs for the Pacific Ocean (Garavilla);
 - → Register Bolton-owned vessels on the transparentsea.org website where we will post data regarding fishing trips within 4 months.

^{*}Small vessels performing short fishing trips (<2 weeks) flagged to the country whose waters in which they are fishing and fishing only with sustainable practices

SUPPORTING MARINE ECOSYSTEMS

- → Support the funding of protected marine areas;
- → Finance projects to combat ocean pollution (recovery of fishing gear, FADs or plastic).

The progress on all the above commitments will be externally audited by an independent third-party certification body/auditor on an annual basis.

Furthermore, we are committed to fully involve our suppliers in this improvement process through specific requests in our buyers' agreement and monitoring progresses.



Guarantee traceability from boat to plate

- → Extend the certified traceability system from tuna to all species;
- → Include on-pack information describing species, ocean of catch, FAO area, and fishing method on all products;
- → Real time communication on treaceability on our website.



Promote seafood market positive change through our public commitments, partnerships, communication and innovation

- → Continue to form partnerships like the one with WWF and be a part of organizations like the ISSF;
- → Engage stakeholder and attend speaking platforms to communicate our commitment to sustainability;
- → Educate consumers by encouraging responsible, aware purchase-making thanks to branded content communication strategy.



Sustainability within our production processes





APPROXIMATELY

3.5 M

Cans produced daily



-20%

Direct greenhouse gas emissions in absolute terms during the fouryear period



>99%

Rate of recycling and waste recovery

At production plants in 2017



ري' -**10**%

Water consumption per ton of product

Environmental performance of our plants

One of the pillars of our strategy is constituted by monitoring our environmental performance which, in addition to undergoing periodic assessments, is also the object of ongoing improvement plans: we focus on ensuring that the Cermenate and Quimper plants, among the first in Europe for production capacity, are also considered best practices with regards to environmental impacts.

Our commitment to reduce environmental impact has involved plant consumption, including greenhouse

gas emissions, energy and water consumption, the production and recycling of waste and the materials used for our product packaging.

Over the past four years, we have observed gradual reductions in greenhouse gas emissions and we have worked towards limiting energy and water consumption per kilogram of product with encouraging results that confirm that we are headed in the right direction. At the same time, the **rate of waste recovery has exceeded** 99% in Italy and 95% in France.



ISO 14001 environmental certification

Our production plants are **ISO 14001** certified, an international standard that defines the set of requisites and guidelines necessary

to define, implement and improve the environmental management system of an organization. Certification was obtained by the Quimper plant in 2012 and by the Cermenate plant in 2015.

In addition to working to improve in-plant consumption, we are committed to reducing environmental impacts across the entire supply chain of our raw materials of animal origin. According to an LCA (Life Cycle Assessment) environmental impact study conducted by us in 2013 on the tuna supply chain, approximately 71% of CO₂ emissions equivalent to the entire production chain, are concentrated in the loins procurement stage, therefore upstream of our production activities. With this in mind, we conduct awareness campaigns targeted at suppliers involved in fishing activities and the processing and delivery of loins so that, in turn, they can undertake activities to improve their environmental performance.

Bolton Alimentari's environmental health and safety policy in the workplace

In October 2016, Bolton Alimentari updated its environmental health and safety policy in the workplace, a document that outlines and explains the underlying principles of activities conducted both in and outside our plants. The 'Policy' outlines future corporate commitments to control the environmental impacts of its production activities, reduce accidents and disease in the workplace and spread the culture of sustainability among its employees and collaborators, who make a key contribution to achieving corporate sustainability objectives.

This document also establishes a series of performance of injuries indicators, including the trend in number of accidents and occupational diseases or the rate of absenteeism - which will be monitored and evaluated by Management during periodic meetings, with the aim of implementing improvement and efficiency plans related to corporate performance.



Our fleet

We own three Purse Seiner vessels measuring 78.33 metres in length and 13.68 metres in width, with a fishhold capacity of 1,644 cubic metres.

These vessels fly the

French flag and fish tuna in the Atlantic

Ocean. Every year, a certification body

issues a conformity certificate for each vessel based on compliance with the criteria pertaining to the prevention of atmospheric pollution and pollution from hydrocarbons and waste water.



Emissions management

Over the past four years, we have paid particular attention to the issue of controlling greenhouse gas emissions, both at our plant and in our offices.

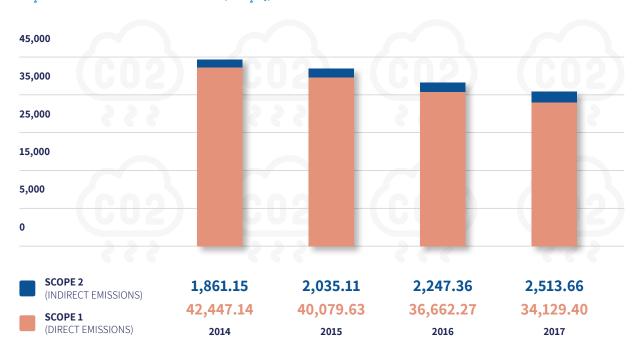
In the period between 2014-2017, the direct emissions of fishing activities and in-plant production activities



dropped overall by 20%, passing from 42,447 to 34,129.40 equivalent tons of CO₂. This was mainly the result of shipping route optimization by Saupiquet, which

has managed to reduce energy consumption and related CO₂ emissions over the past four years.

CO, EMISSIONS IN THE ATMOSPHERE (TCO, EQ)



The calculation of greenhouse gas emissions refers to carbon dioxide (CO_2) . The term "direct" is used to indicate greenhouse gas emissions related to corporate owned sources, including its production assets, while the term 'indirect' refers to greenhouse gas emissions related to the energy sourced. Emissions refer to the Cermenate and Quimper plants plus the fishing fleet owned by Saupiquet.



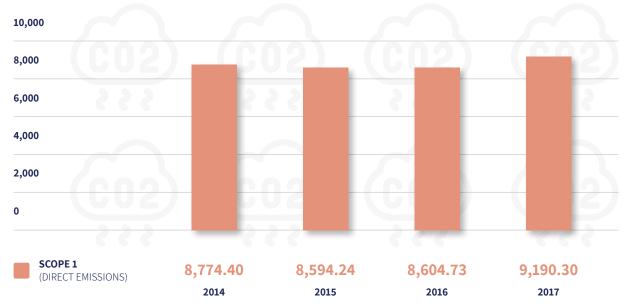
As regards the specific level of production plants, an increase of atmospheric emissions in absolute value was registered, this being proportional to the increase in production volumes.

Furthermore, the efficiency of several industrial processes contributed to reducing various manual processes. In

addition to generating an improvement in the efficiency of these processes, it also increased plant consumption.

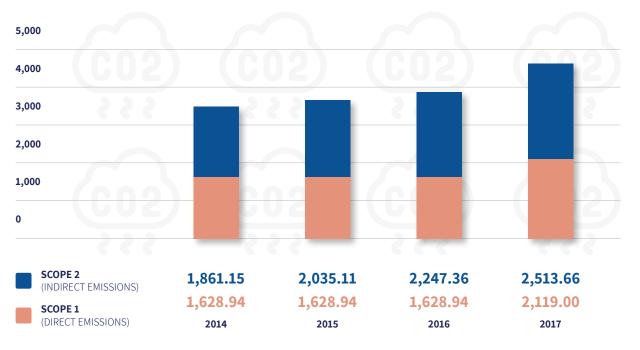
Overall, the **energy intensity index** (the index that cross-references CO₂ emissions with volumes produced) shows how consumption has remained more or less constant.

ATMOSPHERIC EMISSIONS (TCO, EQ) - CERMENATE*



^{*}The emissions in Scope 2 are calculated as equal to zero in that 100% of electric energy is sourced from renewable sources.

ATMOSPHERIC EMISSIONS (TCO2EQ) - QUIMPER









Sustainability within our production processes

EMISSION INTENSITY INDEX* - CERMENATE

	2014	2015	2016	2017
kg Co ₂ eq/ton	0.16	0.16	0.15	0.16

^{*}calculated as kg of CO₂ / tons of finished product

EMISSION INTENSITY INDEX* - QUIMPER

	2014	2015	2016	2017
kg Co ₂ eq/ton	0.41	0.38	0.37	0.42

^{*}calculated as kg of CO₂ / tons of finished product

Lastly, we are also committed to reducing gas emissions produced during the transportation and distribution of finished products. For this reason, in France and Italy, we work with suppliers who are particularly attentive to sustainability and the reduction of their environmental footprint. For example, greenhouse gas emissions related

to products transported by our Italian supplier have decreased continually over the past years, passing from 23.5 kg $\rm CO_2$ eq. per ton of product transported in 2014 to 21.1 in 2017, for a total reduction of 10.2%

EMISSIONS PRODUCED DURING THE TRANSPORTATION AND DISTRIBUTION OF PRODUCTS IN ITALY

	2014	2015	2016	2017
kg Co ₂ eq/ton	23.50	23.20	23.00	21.10

This decrease was due to a reduction in the distance covered by empty vehicles and an increased saturation of same, meaning that many trucks make deliveries on days previously agreed to with our clients' depots and carry full loads. In fact, **smart mobility** solutions have proved to be beneficial to all players involved in the distribution chain. For production companies, the benefit lies in the reduction of one day on lead time¹⁵ while, for freight forwarders, it consists in always travelling with a saturated vehicle and for retailers, it involves improved management of their inventory.

Additionally, we also promote **co-trucking** systems involving the transportation of our goods with those of other companies. Lastly, we also give preference to the use of less polluting vehicles, including **Euro 5 and 6 categories**, whose use in Italy has increased over the past four years **from 59% to 67% of the entire fleet**.



¹⁵⁾ Lead time is a parameter that characterizes a logistics network at different levels. In general, this term refers to the interval of time required by a company to satisfy customer lead time. Shorter lead times allow a company to meet customer requirements more quickly and flexibly.



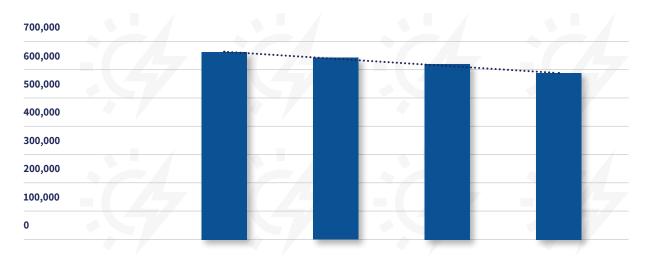
Energy consumption

Over the past four years, like CO_2 emissions, overall energy consumption has decreased. Thanks to a reduction of the shipping routes used by the Saupiquet



fleet, energy consumption has decreased by 11%.

OVERALL ENERGY CONSUMPTION (GJ)



661,010.49 2014 641,119.72 2015 619,058.07 2016 587,342.42 2017





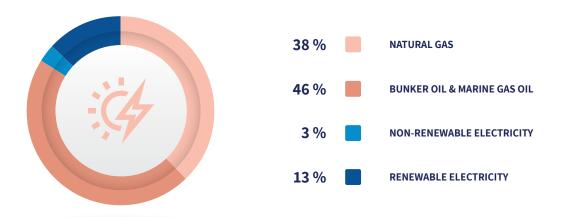


Production

54

Sustainability within our production processes

MAIN ENERGY SOURCES - 2017



On the other hand, energy consumption at our plants is directly correlated to daily volume production, the production methods used and climate conditions. Over the past four years, despite a gradual increase in plant efficiency, the significant increase in production volumes and the automation of several processes has resulted in an increase in energy consumption per unit of finished product at both the Cermenate and Quimper plants.

Our commitment to this issue is ongoing and we have implemented a series of initiatives aimed at improving

our energy efficiency, increasing our use of renewable electric energy sources until our next step towards

cogeneration. For example, since 2011, our Cermenate plant has sourced 100% of its electric energy from renewable sources and in particular, hydroelectric energy. Over the next few years, we hope to achieve the same result at Quimper in order to consolidate the gradual increase of renewable sources within the framework of corporate energy consumption.



ENERGY CONSUMPTION CERMENATE (GJ)*



^{*}Data related to the sole consumption of the Cermenate plant. Electric energy is certified as originating from renewable sources. In addition to electric energy and natural gas, the plant also consumes a minimum amount of diesel fuel, whose data for reasons of legibility are not included in the graph above. In 2017, diesel consumption was equal to 711 GJ, a generally constant figure in the four year period between 2014-2017.

ENERGY INTENSITY INDEX* - CERMENATE

	2014	2015	2016	2017
GJ/ton	4.46	4.62	4.41	4.50

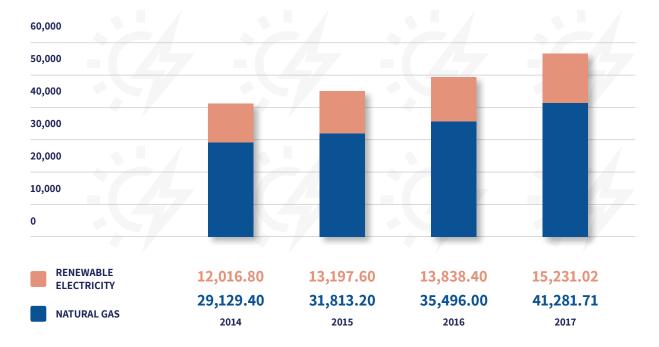
^{*}The energy intensity index cross references the energy consumed (expressed in GJ) with the volumes produced (expessed in tons)

NB: Data related to energy consumption does not include consumption in 2014 at the Italian headquarters of Bolton Alimentari in Milan or the French headquarters of Courbevoie. However, this data represents a minimum fraction compared to plant consumption.





ENERGY CONSUMPTION QUIMPER (GJ)



ENERGY INTENSITY INDEX* - QUIMPER

	2014	2015	2016	2017
GJ/ton	4.84	4.73	4.75	5.11

 $^{{}^{\}star}\text{The energy intensity index cross references the energy consumer (expressed in GJ) with the volumes produced (expressed in tons)}$



Sustainability within our production processes

Water consumption

In addition to activities involving the defrosting of raw materials and sterilization of the finished product, our water consumption is related to the functioning and cleaning of our production plants.

Over the past four years, production line efficiency has resulted in a **reduction of water consumption per ton of product both at the Quimper and Cermenate plants,** which decreased by 22% and 7% respectively.

WATER CONSUMPTION BY SOURCES - 2017

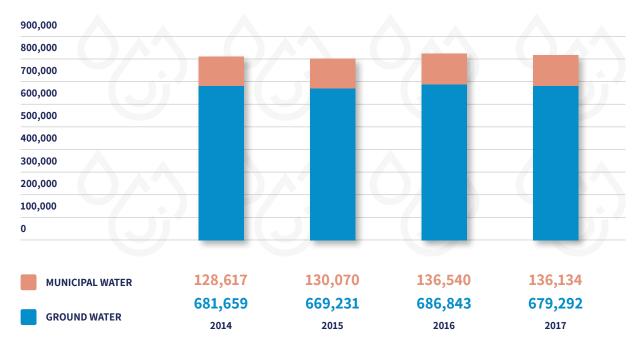


7 % MUNICIPAL WATER

83 % GROUND WATER

*Data related to the Cermenate and Quimper plants.

OVERALL WATER CONSUMPTION (M³)*



^{*}Data related to the Cermenate and Quimper plants.







Sustainability within our production processes

WATER CONSUMPTION (M³) - CERMENATE

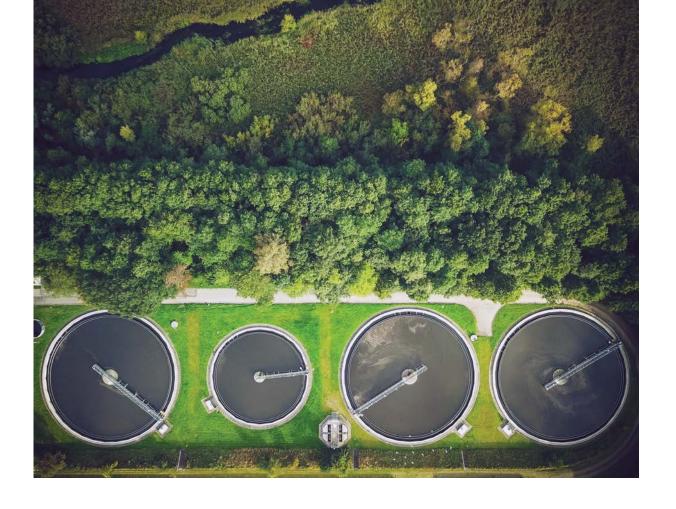


WATER INTENSITY INDEX* - CERMENATE

	2014	2015	2016	2017
m³/ton	12.73	12.84	11.96	11.89

 $^{{}^{\}star}\text{The water intensity index cross references water consumed (expressed in m3) with volumes produced (expressed in tons)}$





WATER CONSUMPTION (M³) - QUIMPER



WATER INTENSITY INDEX* - QUIMPER

	2014	2015	2016	2017	
m³/ton	15.09	13.42	12.42	11.74	

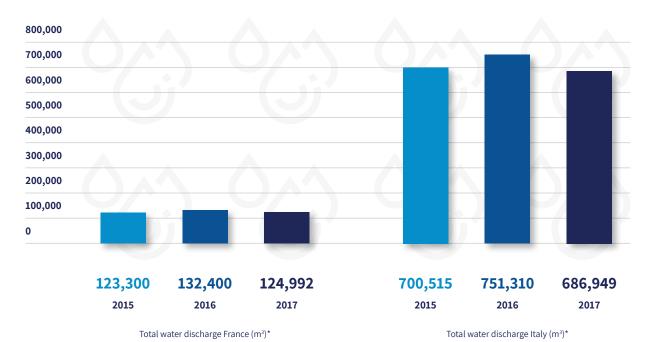
^{*}The water intensity index cross references water consumed (expressed in m3) with volumes produced (expressed in tons)







TOTAL WATER DISCHARGE (M3)



On the other hand, waste water is treated by means of special systems installed at the plant. Once purified, in the case of Cermenate, it is reintroduced into the area's water basin, while in the case of Quimper, it is re-introduced into the urban water network. In the

latter case the water is pre-treated at the Quimper waste water treatment facility; then the waste water destined for further purification stages is introduced into the city network by the Water Authority.

Energy efficiency projects

In 2015, in conformity with Legislative Decree no. 102/14, we conducted an energy diagnosis at our Cermenate plant. The aim of this procedure was to identify critical areas in terms of energy consumption and costs on a level of single operating units and to assess the implementation of possible interventions designed to obtain measurable benefits through the use of quantitative KPI. This diagnosis resulted in our identifying the need to replace traditional light bulbs with LED lights. Furthermore, in 2018, we plan to install a system to recover heat energy from the combustion fumes produced by the boilers of the plant's thermal power plant.

We periodically engage in raising employee awareness about reducing energy use in the performance of their daily duties, with internal training programs on waste reduction in water and electric energy use.

Our focus on energy saving is also demonstrated by the investments made: in more energy-intensive plants, the new equipment installed is equipped with systems designed to cut down on heat (economizers) and electricity consumption (electric motor speed regulators equipped with inverter control). For example, the traditional motors used for the production of compressed air in the water treatment plant were replaced with compressors equipped with an inverter. This resulted in a net energy saving of 17.02 tp (tonnes of oil equivalent). Thanks to this intervention, in October 2016, we obtained 45 White Certificates, tradable titles that certify the achievement of energy savings in energy end-use consumption through interventions and projects aimed at increasing energy efficiency.



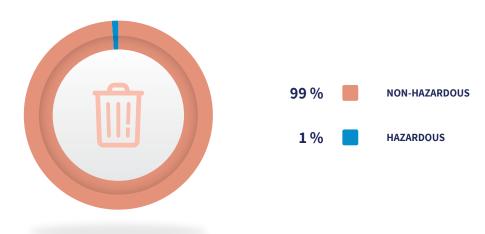
Waste management

Bolton Alimentari is distinguished by its meticulous waste management process. In 2017, almost 99% of the 7,305 tons of waste produced by the Cermenate and Quimper plants and the Saupiquet fleet were recovered and recycled at authorized plants. In particular, the waste produced by the packaging used in our production

activity, including paper, cardboard, plastic, wood and metals, are all earmarked for recycling or re-use.

Hazardous waste only accounts for 1% of the total waste produced - equal to approximately 93.65 tons - and consists mainly of waste oils, electronic waste, aerosols and chemical components, such as aromas and sprays.

HAZARDOUS AND NON-HAZARDOUS WASTE PRODUCED IN 2017 (%)



Modernization activities at the Quimper and Cermenate plants

Over the past three years, we have conducted interventions targeted at the modernization of the Quimper and Cermenate plants with the aim of reducing their impact on the environment and local communities and improving working conditions.

In 2015, thanks to a collaboration with a local company, interventions were conducted on the Quimper plant's organic waste collection system. The aim of these interventions was to reduce odour emissions produced by the production plant. Other interventions are in the process of being studied.

As regards Cermenate, we continued with the investments allocated during the previous three-year period, with the introduction of automated systems that

eliminated the manual handling of loads in sterilization areas. We also experimented with automated tuna loading systems in anticipation of extending them to all production lines. Other interventions are in the process of being developed.

We also made considerable investments in our waste water treatment plant, significantly improving its efficiency and reliability thanks to the use of state-of-the-art technologies. To further improve working conditions, both at our Quimper and Cermenate plants, we implemented interventions aimed at the treatment of air with the introduction of cooling systems in production areas.



Packaging sustainability

Our packaging

The packaging of a product is the most immediate means of communicating information that often determines consumers' purchase-making decisions.

For this reason, we are committed to using our packaging to convey clear, correct information regarding the ingredients contained in our products and their nutritional properties. In 2018, we will start introducing information about fishing oceans, the FAO area and fishing methods on the packaging of all our tuna-based

products. At present, this information is only accessible by filing a request for traceability on our websites.



For the packaging of our finished products we mainly use **cardboard**, **tinplate and aluminium**. In keeping with the increase of production volumes over the past few

years, consumption of these raw materials has increased slightly over the past three years.

During the same period, as shown in the table below, the percentage of raw materials used, including paper, cardboard, tinplate and aluminum obtained from recycling materials, also increased.

Type of packaging	Percentage of recycled raw materials (2017)
Paper and cardboard	81%
Tinplate	35%
Aluminium	40%
Wood	0%
Plastic	0%
Glass	32%

In collaboration with our suppliers, we have worked towards reducing the thickness of our cans and on increasing the recyclability of our materials.

Furthermore, special attention has been given to packagerelated performance. The procedures developed to reduce the thickness of packaging materials - in proportion to the cans produced - allowed us to obtain an overall savings between 2014 and 2017 of **approximately 290 tons of aluminium and tinplate**, equal to a weight of approximately 240 utilitarian vehicles.



81%PAPER AND CARDBOARD
FROM RECYCLED RAW MATERIAL



290 TONS ALUMINIUM AND TINPLATE SAVINGS = 240 UTILITARIAN VEHICLES

Sustainability within our production processes

Our projects to reduce packaging

The study conducted by Breizpack

Breizpack is a network of packaging producers active in the French region of Brittany. In January 2016, Saupiquet teamed up with Breizpack to conduct a study to map the main global developments related to the world of packaging. The aim of this study was to identify innovative, sustainable solutions that could be adopted during the distribution of products and at sales points, based on the development of projects that will be implemented over the next few years.

Participation in the CONAI Prevention and **Packaging Sustainability Contest**

Bolton Alimentari was the winner of the last three editions of CONAI's Prevention and Packaging Sustainably Contest. In 2015, we won the contest based on the environmentally-friendly packaging of Rio Mare's 120g cans of Tuna in Olive Oil in 2014. By reducing the thickness of the lids, we managed to reduce the weight of our cans by 3%. In 2016, we received another award for further reducing the thickness of Rio Mare's 120g and 80g cans of Tuna in Olive Oil. We achieved a 6% weight reduction of both cans by reducing the thickness of the tinplate. Lastly, in 2017, we received an award for a project designed to reduce the thickness of the cans and lids used for our Rio Mare Salmon Fillets. This project enabled us to reduce the overall weight of the can by 10%. Thanks to this result, we received a contribution of respectively €3,000 in 2015, €13,000 in 2016 and €14,000 in 2017.



CONAI, National Packaging Consortium

Is a private, nonprofit consortium of private companies working together to tackle one of society's problems: recycling. The consortium includes more than 1,000,000 packaging manufacturers and companies who use

packaging. They pay a mandatory fee that allows CONAI to help communities implement environmentally-friendly waste collection and the recycling of packaging materials.







Our commitment to improving environmental performance



Reduce the carbon and water footprints of our plants

- → Improve energy efficiency also through cogeneration in the Cermenate plant;
- → Continue to source electricity from renewable sources;
- → Reduce CO₂ emissions;
- → Continue to work on reducing water consumption (units per finished product).



Maximize waste recovery

- Continue to recycle or reuse all waste;
- → Working for the recovery of edible waste from processing;
- → Recover 100% of the products that are edible but not marketable.



Reduce the ecological footprint of packaging

- → Continue to increase the use of recycled or FSC-certified paper;
- → Apply environmental assessment criteria to product innovation projects;
- → Improve information on the recyclability of our product packaging;
- → Continue the work of reducing the thickness of the packaging.



Reduce the ecological footprint across the supply chain

- → Stimulate suppliers to reduce greenhouse gas emissions from logistics;
- → Reduce greenhouse gas emissions in the supply chain.







Employees



2016

Publication of Bolton Group's Human Rights Policy





3,300,000

Cans donated as part of our collaboration with the Food Bank



400

Participants in the Tous Hanscene project in France

People

Respect for people

Our people

Since the very beginning, we have striven to respect our employees and meet their requirements by guaranteeing safety in the workplace, offering stable contracts and a work environment which attracts new talent.



Thanks to the growth and sustainability of our business, the number of our employees has increased from 818 to 932 resources.

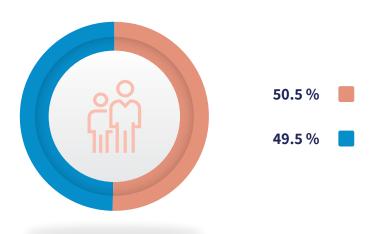
In 2017, **37% of our workforce** was comprised of **employees, managers and executives** (white-collar workers), while the remaining **63%** was compromised of blue-collar **workers**.

At the end of 2017, 49.5% of our workforce was comprised of men and 50.5% of women, which in numeric terms made them the most widely represented gender.

WOMEN

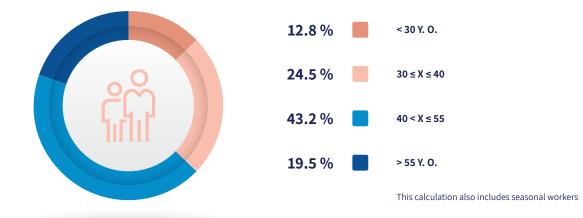
MEN

BREAKDOWN OF WORKERS BY GENDER (2017)



This calculation also includes seasonal workers

BREAKDOWN OF THE WORKFORCE BY AGE BRACKET (2017)





Welfare and internal communications

We are convinced that the success of a company is also measured by its attention to the health and wellbeing of its employees, both inside and outside the workplace. For this reason, every year we provide our employees with a plan of corporate welfare activities, whose task is to further improve the quality of the work environment, meet employee requirements and develop a stronger sense of belonging to the corporate community.

This initiative is part of a wider strategy of the Bolton Group, which launched the **Bolton for You** program in 2013, a corporate welfare project that is enriched yearly with an increasing number of services dedicated to employees and is divided into four areas: health, family, savings and free time.

This program - currently only in force in Italy - offers the following benefits: health prevention campaigns (a health budget, specialist protocols and cancer prevention for women); family-friendly services (the reimbursement of school fees and summer camps); cinema, Spa and travel vouchers, discounted travel passes; a service dedicated to compiling income tax return forms (model 730), etc.

In addition, internal communication activities were intensified to foster employee participation in corporate life. These involved improving our corporate newsletter to inform employees about innovations and daily progress, including those related to sustainability and business.

Personnel training and development

Training is a key value for a company operating in a global context. To encourage the growth of our personnel, we developed a catalogue of courses and development plans to strengthen their managerial and functional skills and improve their knowledge of languages. In particular, over the past two years, the number of personnel attending Marketing and Sales courses has increased thanks to a Marketing Academy. The Marketing Academy is an international program based on our best practices and internal methodologies, integrated with examples of success stories told by people who do not work for our company. In 2016, the first edition of the 'Finance for non-Finance People' course was held in Italy. The aim of this course is to improve managers' knowledge of the financial tools available and their awareness of the effects that certain market choices could have from an economic viewpoint. The first edition was attended by 19 Bolton Alimentari managers who participated in training meetings under the guidance of an internationally recognized expert, for four non-consecutive days. In the future, we are planning to extend participation in this course to more junior resources while simultaneously increasing the number of managers involved.

In 2016, we also conducted the first **specific training course dedicated to the respect of human rights**. This course, which constitutes the first stage of a program dedicated to raising employee awareness about the





Human Rights Policy, involved 13 managers from the corporate functions most closely involved.

Lastly, over the next few years, we are planning to increase our offer of courses related to the digital sphere, including in particular, training dedicated to key managerial software and data analyses, which is increasingly necessary to guarantee maximum workplace efficiency of the individual functions involved.

Over the past four years, the total number of training hours received by our Italian and French employees increased by 12%, passing from 11,980 in 2014 to 13,427 in 2017. Excluding the mandatory courses required by law, our objective was and continues to be to offer training courses designed to meet the specific needs of our employees.

In 2017, we launched a safety training project that involved almost all our workforce: the **Refresher Course on the General Safety of Workers** (Legislative Decree no. 81/2008) - *Safety Crime*, which involved 469 employees for a total of 3,580 training hours. In 2017, the refresher course on the General Safety of Workers, which we plan on repeating periodically, involved a highly significant investment.

Lastly, every year, we organize an **Orientation Plan**, a three-day program targeted at new employees and aimed at introducing the company, its values and corporate functions through the expertise of the key managers of various corporate functions. Since 2014, 65 new hires have participated in this program.

Evaluation and retention mechanisms

We are actively engaged in keeping employee motivation at a peak. We pursue this objective by using performance development mechanisms based on measurable parameters. Every year, thanks to a Performance Management process, employee feedback seminars are conducted to better understand the growth paths of each employee and provide personalized assessments on the quality of work in the company. In 2016, we introduced the Group program 'HR IS Evolution Project', a software system designed to increase the uniformity of HR procedures and Business Intelligence systems in the various companies of the Group. As part of this project, we launched 'BTalent', an online platform designed to improve process management and the quality of information related to the development of human resources. Since 2016, the Performance Management process has been managed through this platform; this enables the managers of all companies to manage goal assignment and the performance evaluations of their employees more agilely, helping them to identify the best career development paths.,





Respect for people

Safety in the workplace



Safety in the workplace is one of our top priorities, which we have addressed by focusing on various projects and initiatives. In 2013, we obtained **OHSAS 18001** certification for the Cermenate

plant, an international standard that outlines the necessary requisites to implement an occupational safety and health system. In 2015, the Quipmer plant also obtained said certification.

In 2016, we launched and implemented the Cermenate Safety Project dedicated to team leaders and plant

maintenance workers, with the aim of further improving their skills and awareness about issues related to safety. Thanks to a **Safety Game**, participants were asked to solve the case of a simulated accident and determine the causes of the accident. This enabled participants to fine tune their observation skills and prevent the dynamics that could cause an accident.

We are aware that occupational safety requires commitment and ongoing attention. Despite an increase in the number of injuries in absolute terms over the last four years, thanks to the increase in awareness, we managed to reverse the trend last year.

TOTAL NUMBER OF INJURIES BY COUNTRY



In addition to the absolute value of injuries, we also considered two other parameters: severity index16 and frequency index¹⁷, involving different trends both in Italy and in France. In Italy, due to increases in production and the number of new people hired at the Cermenate plant over the past four years, these indices have increased, even though over the past two years, training and prevention activities have shown that we are working in the right direction.



The severity index corresponds to the ratio between number of days of absence from work resulting from the injury and hours worked, multiplied by 1,000,000

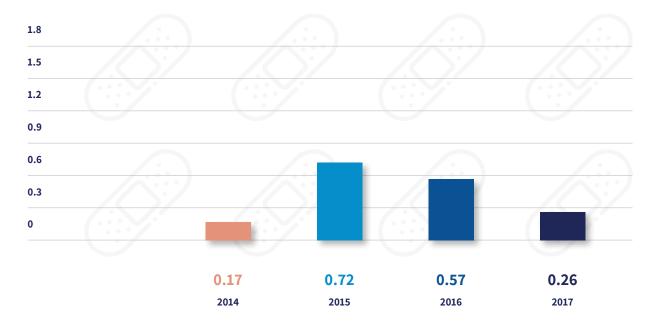
The frequency index corresponds to the ratio between total number of injuries and hours worked, multiplied by 1,0000,000.

The injury severity index decreased both in France, from 1.69 in 2014 to 0.92 in 2017, and Italy where, after reaching a peak of 0.72 in 2015, it dropped to 0.26 in 2017.

A particularly important result concerns frequency index performance over the past few years: in France,

this dropped from 42.47 in 2014 to 30.50 in 2017. In Italy, following a negative peak of 23.20 in 2015, we managed to turn things around in 2016, finally achieving a consistent index reduction of approximately 14.13 in 2017

SEVERITY INDEX ITALY



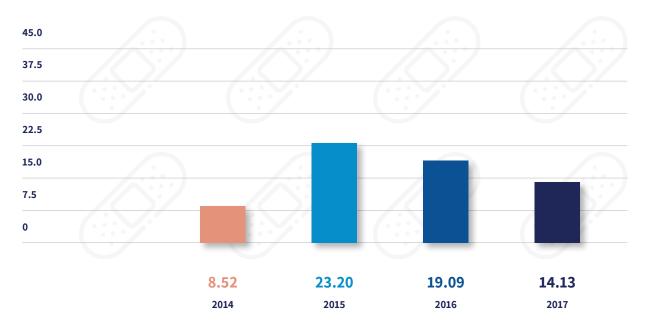


Respect for people

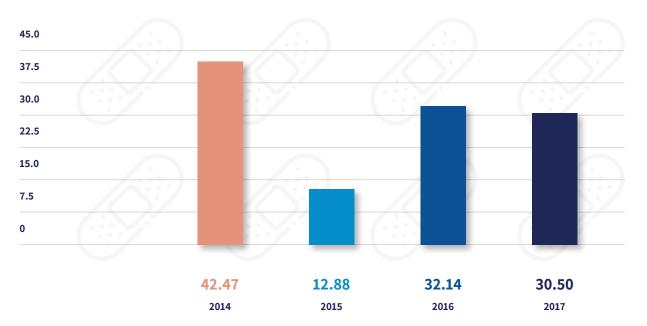
SEVERITY INDEX FRANCE



FREQUENCY INDEX ITALY







Lastly, in 2016, we organized a **safe driving course** for 60 of our sales personnel at the Monza racetrack. The aim of this course was to improve vehicle control skills through

simulations of emergency situations, drills in critical areas and the reinforcement of correct driving practices.

Partnerships with universities

In 2014, the Research and Development department of the Quimper plant launched a partnership program with the city's high schools and universities. The end goal of this program - implemented once a year - was to offer four resources internships in their department.

This project involves various activities, including the development of an entrepreneurial mindset. In 2016, a tasty and innovative solution based on the idea of using Algae Spirulina in canapés resulted in our winning the 'ialys' agro-food award. Ialys is a local network whose members include food industry players in the region of Cornouaille.





Our commitment to employee wellbeing



Promote zero accident

- → Reduce the injury severity index;
- → Reduce the injury frequency index.



Promote equal opportunity

→ Reduce the gender gap in management positions.



Improve employee satisfaction in the workplace

- → Increase the number of employees covered by the company welfare system;
- → Increase the level of employee satisfaction and involvement.

Respect for people

The Responsible Supply Chain and our business model

Over the years, we have adopted a procurement management and production model that encourages the growth of local economies in the developing countries in which we work. This has been achieved by validating the enormous natural resource represented by tuna, often one of the most significant sources of income of these countries.

Production at the Cermenate plant is entirely based on the use of pre-cooked loins that are processed by hand in fishing areas. This method impacts positively on local economy both directly, thanks to the creation of jobs at production plants and indirectly, by boosting the local economy involved in providing all the services that the plants require.

Furthermore, the decision to increase the percentage of tuna caught using either Pole & Line or artisanal fishing methods has generated the reactivation of small local fleets, creating prospects for economic, social and cultural development in different emerging countries.

This is a model based on the philosophy of sustainability and the generation of shared value, applied across the entire production chain, from fish procurement areas to the tables of consumers.

The French supply chain

Saupiquet is a member of "Produit en Bretagne", an association whose objective is to contribute, in the spirit of ethics and solidarity, to the development of regional employment through the economic and cultural

dynamics of Brittany. The majority of products manufactured at the Quimper plant carry the 'Made in Brittany' logo.





Protecting human rights across the supply chain

In addition to being an essential element of all corporate activities, we believe that respecting human rights is a key pillar of our sustainability strategy For this reason, we are proactively committed to guaranteeing the protection of these rights both within our company and across the entire supply chain, actively collaborating with our suppliers who are required to endorse and respect the principles contained in the **Ethics Code** and in the **Human Rights Policy of Bolton Group**, of which we are a member company.

The Human Rights Policy, published by Bolton Group in December 2016, defines both the guiding principles and the Group's commitment to protecting the essential rights of workers, including free association, diversity and equal opportunities, as well as the rights of local populations. This document also governs respect of the regulations pertaining to health and safety for all workers of the Group's companies and certifies that working and pay conditions are aligned with local law and sector standards. Lastly, this document refutes child labour and forced labour and guarantees respect of *International Labour Organization* (ILO) conventions

Bolton Alimentari has communicated the contents of this policy to all its employees, clients and suppliers. In particular, the latter are asked to endorse and respect the principles outlined in the policy.

In 2017, the contents of this policy were shared with our suppliers and a clause related to its acceptance was included in all contracts and subject to signature. An assessment questionnaire aimed at verifying respect of the principles of the policy was sent to our strategic suppliers as well as those operating in countries at

risk of human rights violation. The assessment and intervention procedure is described in the 'Human Rights Management Manual', which is an integral part of our corporate quality management system. In order to define a priority action, we classified our suppliers based on their exposure to the risk of human rights violations. In order to establish the level of risk, three aspects were taken into consideration:

- → Strategic relevance of the good/service supplied
- → Volume of supplier turnover
- → Country in which the good/service supplied is produced or issued

Suppliers at **high risk** are required to complete a selfassessment questionnaire once a year, suppliers at **medium** or **medium-high risk** are required to complete a questionnaire **once every two years**, while suppliers falling within **medium-low** or **low** categories are not sent this questionnaire. However, **should the need arise**, they too may be asked to complete this questionnaire.

Based on the results that emerged from questionnaires, starting from 2018 we will take action by conducting on-field audits about potentially critical situations, and in areas considered at major risk. Once these audits have been conducted, in the event of violations or anomalies being reported, we will evaluate the implementation of suitable actions to resolve or eliminate violations that have actually been identified.

Lastly, in March 2017, we updated our **Tuna Policy** in which we asked our suppliers to also respect the regulations stipulated by the ILO C188 convention governing the respect of workers' rights across the fishing supply chain.





SUPPLIERS WHO SIGNED BOLTON GROUP'S HUMAN RIGHTS POLICY



ASSESSMENT

SUCCESSFULLY CONCLUDED FOR SUPPLIERS AT HIGH RISK



International Labour Organization

Is a specialized agency of the United Nations dealing with labour problems and work-related aspects, particularly international labour standards, social protection and equal opportunities.

More specifically, the **ILO C188** convention governs the respect of workers' rights across the fishing supply chain. **Ratified by 10 countries**, it was enforced in **November 2017**.



Our social projects

At Bolton Alimentari we are convinced that our commitment cannot end with the production and distribution of quality products, but it must be completed with activities and initiatives aimed at the communities in which we operate to improve individual and social wellbeing.

OUR PARTNERSHIP WITH THE FOOD BANK

Reducing food waste at all stages - from processing to the sale of our products to end consumers - has always been one of our key priorities. For this reason, for years we have collaborated with the European Food Bank



Federation by donating unsellable yet perfectly edible products to people in difficulty in Italy and France.



European Food Bank Federation (FEBA)

Is a humanitarian association founded in 1986 that comprises more than **270 local food banks** in **23 European countries**. The latter deals with the collection of food and the recovery of food surplus from agricultural and

industrial production and their redistribution to charitable bodies distributed across the area that provide support to people living in poverty.

Thanks to long-term conservation, particularly safe and resistant packaging and their high protein content, our products are among the most suitable for redistribution to people living in conditions of poverty or emergency. Rio Mare has supported the Food Bank since 2011 by donating surplus food from their production line and unsellable products from mass retail sales points. In 2014, we launched the fourth consecutive **#unTonnoPerTutti** initiative which involved consumers at 2,500 sales points across Italy. In addition to being asked to donate one can of Rio Mare Tuna, they were given the option of using special promotions. In the fouryear period between 2014-17, our contribution in terms of overall product donations was translated into more than 3,300,000 cans donated, which contributed to satisfying the daily protein requirements of over one million people. In addition to the above, the company donates meals through its 'Siticibo' program, an initiative promoted by the Lombardy Food Bank that involves the collection of surplus food from company canteens, including that of Cermenate. This service, which was interrupted in 2016 due to technical problems, was resumed in 2017

for a total of more than **8,800 meals distributed over a 4-year** period. Lastly,
in 2017, we participated in the **Food**

Poverty Lab promoted by the Lombardy Food Bank, whose aim is to identify solutions for the recovery of surplus ingredients used during production processes. These meetings resulted in the idea of developing a project to recover certain raw materials and will be the subject of a study and experimentation at our Cermenate factory in 2018.

SUPPORTING THE 'FORGOTTEN HOLIDAYS' INITIATIVE

Every year since 2012, Saupiquet has participated in 'The Forgotten Holidays' initiative organized by Carrefour to help people in difficulty. For one week, 7% of turnover generated by sales from Saupiquet products at the Carrefour sales point are donated to this cause which enables disadvantaged children to enjoy a one day holiday. In 2017, Saupiquet contributed to this initiave with a donation of €104,190.59





RIO MARE'S PARTNERSHIP WITH PALLACANESTRO CANTÙ

In the three-year period between 2014-2016, we teamed up with Pallacanestro Cantù. The aim of this partnership stemmed from a common intent to teach youngsters and their families about the importance of a healthy lifestyle including a varied and balanced diet. This initiative is part of Rio Mare's awareness campaigns on issues related to proper nutrition, sport and health.

In addition to the above, there is the close tie to the Como area, which both Rio Mare whose production activities are headquartered in Cermenate and Pallacanestro Cantù share, and both commit to promoting with



initiatives dedicated to the local community. These include the Pallacanestro Cantù Youth Project in collaboration with the company's youth sector, which comprises 24 of the area's basket ball teams and more than 5,000 youngsters

aged between 6 and 21, with whom we launched a food education project. Based on the same objective, we also organized a series of meetings at schools in the Como area titled 'Palleggiando con Cantù e Brianza' ('Dribbling with Cantù and Brianza'), which involved **approximately 800 children between the ages of 8 and 11.**

FRIENDS OF COMO

Since 2014, we have been members of the 'Friends of Como' association, which includes more than 110 top-level Como-based businesses (where our Cermenate production center is based) with the aim of increasing the awareness and image of the city of Como and its outlying areas through the creation of initiatives and development projects. Furthermore, since 2016 we have supported the 'Como Città dei Balocchi' ('Como Pleasure Island') initiative, a Christmas fair organized by the Friends of

Como dedicated to the city's children and families.

THE FRIENDLY MINIVAN OF THE COMMUNE OF CERMENATE

In 2014, we were among the companies that contributed to the purchase of a 'Friendly Minivan' for the commune of Cermenate. The minivan, made available to social services, is a vehicle equipped to transport disabled persons in wheelchairs, witnessing the concrete commitment of our company to the wellbeing of the local community.

JEUNESSE ASSOCIATION - QUIMPER

Saupiquet participates in community life in the city of Quimper by offering tours of their factory to young college and high school students. This initiative is a part of city-related vocational training program, including 'Cornwall at Heart', whose aim is to help the young people of Quimper access career education and guidance programs.

THE TOUS HANSCÈNE PROJECT

Saupiquet is among the supporters of the **Tous Hanscène** project, a competition aimed at encouraging the entry of young disabled people into the French university system. Only 7% of French high school students with disabilities continue their studies at university and only 1% obtain degrees. The competition consists in the creation of videos by a team of university students, which in addition to showing that further education is possible for disabled students, outlines the job opportunities that are open to them once they have obtained their degrees. **In 2016, the fifth edition of the competition involved the participation of more than 400 students** with 100 videos.







Our commitment to the supply chain and local communities



Protecting human rights across the entire supply chain

- → Complete the internal assessment of compliance with the Bolton Group Code of Ethics and Human Rights Policy by our suppliers;
- → Develop an annual audit plan addressed to our suppliers on human rights issues:
- → Adopt the Seafood Taskforce Social Standards as soon as they are finalized and available



Create shared value for the fishing communities from which we make our procurements

→ Implementation and support of socio-economic development projects.



Promote corporate citizenship in the communities where our goods are produced

→ Investing adequate resources to finance projects for the benefit of the local community where we operate.



06. Proper nutrition



□ | so **9001**

Certification of both plants



1.4 MILLION

Families involved

4,500

Health practitioners involved

Nutrition and Health campaign in 2016 and 2017



Launch of innovative products during the four-year period



 $\mathbf{1}_{\mathsf{out}\,\mathsf{of}}\mathbf{2}$

Italian families consume **Rio Mare products**

Our products: safe, healthy and high-quality

Our leadership is the result of our constant attention to guaranteeing the quality and safety of our products and meeting the requirements of our consumers and clients. This is achieved through the meticulous selection of raw materials, scrupulous controls across the supply chain and ongoing activity in the field of research and development aimed at continually improving the quality of our products.

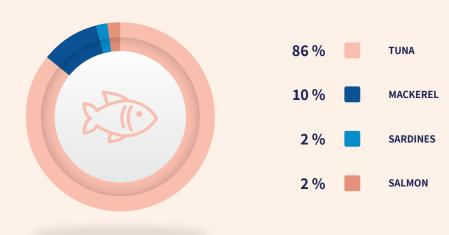
Our raw materials

Over the past four years, the consumption of raw materials used to manufacture our products at our plant has increased in proportion to our production, with a total volume of fish consumed equal to **44,831 tons*** in 2017 and a volume of raw materials of vegetable origin,

including vegetable and olive oils, equal to **28,510 tons** in 2017.

Tuna corresponds to approximately 86% of our fish consumption, followed by mackerel with a percentage of around 10%, while to-date, salmon and sardines represent the lowest percentage of our production.

FISH CONSUMPTION DURING THE THREE-YEAR PERIOD, IN THOUSANDS OF TONS.





TOTAL VOLUME OF FISH
44,831 TONS



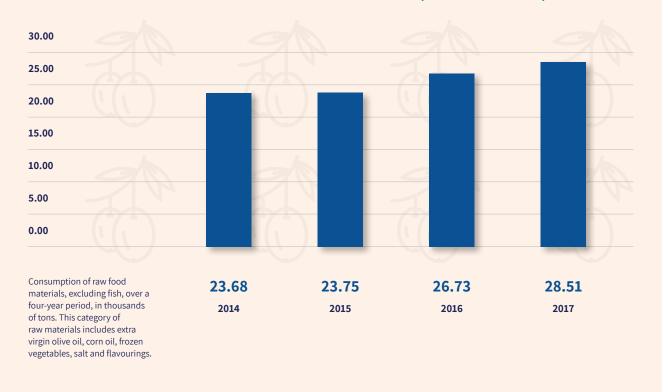
VOLUME OF RAW MATERIALS
OF VEGETABLE ORIGIN
28,510 TONS

 $^{^{\}star}\text{This data refers to the whole fish whose yield accounts for 36.5\% for tuna, 55\% for salmon and 100\% for mackerel and sardines$









Controls

Every year, we commit to conducting widespread controls across the production chain, from raw materials to the finished products, using certified external analysis laboratories.

When choosing potential suppliers, we only consider companies that are able to guarantee high standards of quality and hygiene. During the purchasing stage, our key suppliers are required to undergo a series of audits aimed at assessing their knowledge of aspects related to the quality, hygiene and safety of the raw materials and testing the effective 'goodness' of the practices used during the sourcing and processing stages.

At the same, time we also invite our key suppliers to visit our factories. This gives them an opportunity to have a better understanding of our production processes, our principles of conduct and our approach to quality and sustainability,

Rio Mare periodically conducts quali-quantitative research on finished products in order to monitor consumers' sensory perception of our products. In order to achieve this, we have started collaborating with a specialized institution and created a panel of expert canned fish consumers who periodically express an overall satisfaction rate and a suitability assessment



based on a series of attributes related to quality. In 2017, **10 tasting sessions** were conducted with a panel of 100

people. Lastly, in 2016, we also signed a collaborative agreement with the **University of Western Britanny's Laboratory of Biodiversity and Microbiology** in order to develop innovative methodologies for the conservation and sterilization of our products.





MORE THAN 8,000
ANALYSES ON RAW MATERIALS



MORE THAN 15,000

ANALYSES TO MONITOR THE PRESENCE OF HISTAMINES AND MERCURY



APPROXIMATELY 50,000
ORGANOLEPTIC CONTROLS CONDUCTED
ON THE FINISHED PRODUCT



MORE THAN 6,000 ANALYSES CONDUCTED ON FINISHED PRODUCTS



Laboratoire Universitaire de Biodiversité et d'Ecologie Microbienne (LUBEM)

With headquarters in Brest, is a research laboratory of the University of Western Brittany specializing in

research on the Biodiversity and Ecology of Microorganisms for potential application in the agro-food and pharmaceutical sectors.

Our endorsement of international standards

As proof of the company's commitment to guaranteeing product quality and customer satisfaction, Bolton Alimentari and Saupiquet's quality management system is certified according to the **ISO 9001** standard. This standard establishes the requisites to implement a quality control

system within the company.



Furthermore, both the Cermenate and Quimper plants are certified according to the standards approved by GFSI (Global Food Safety Initiative), a global organization that brings together key actors of the food industry to collaboratively drive continuous improvement in food management systems. As regards the above, the Cermenate plant is certified according to the **FSSC 22000** standard, while the French plant of Quimper is certified according to the **IFS** standard. These standards guarantee the food safety and hygiene of production plants.



The nutritional benefits of our products

We believe that our company should play a key role in promoting proper nutrtion through a procedure aimed at both the nutritional and qualitative appreciation of our products.

In general, canned fish has the same health benefits as fresh fish. It is characterized by an important protein content and by a variable lipidic component depending on the type of product evaluated. Additionally, the fats contained in canned fish are unsaturated fatty acids, whereas in most cases, polyunsaturated fats are most prevalent. Polyunsaturated fatty acids are mainly represented by Omega-3 EPA and DHA, especially in regard to blue fish like mackerel and sardines. The consumption of this type of fish can therefore be associated with numerous health benefits, including the

reduction of lipids in the blood, making them perfect allies for cardiovascular health.

In addition to containing precious, 'heart-friendly' unsaturated fatty acids, fish is an excellent source of several vitamins and mineral salts that are important for health and wellbeing.

An important stage in the procedure of evaluating our products from a nutritional viewpoint was the development of a dossier on canned fish, which once again confirmed how, due to its Omega-3 fatty acid content, fish consumption in general is a highly efficient option for preventing the risk of various types of diseases, especially cardiovascular disease. The most interesting aspect that emerged from the dossier is that, from a nutritional perspective, canned fish has the same health



benefits as fresh fish. Both products were found to contain the same nutrient-rich properties, including the noble proteins and Omega-3 polyunsaturated fatty acids that make fish an essential element in a balanced diet. The fact that the working processes involved in canning fish have a negligible influence on the composition of the finished product and are only limited to a few micronutrients, shows that canned fish is an excellent alternative to fresh fish. In addition to being equally nourishing, it is pre-seasoned and ready-to-eat.

In fact, the maintenance of the nutritional values characteristic of different species following the catch is guaranteed by the processing procedure which involves a first processing stage directly in the fishing area, followed

by immediate freezing. For example, in the case of tuna, the fish is cleaned, pre-cooked, cleaned again and then frozen. Following this procedure, the tuna loins are ready to be dispatched to Italy for canning. On their arrival, the loins are defrosted, sterilized, packaged and stored in the warehouse. Our canned tuna does not contain any ingredients other than clean, boned fish, salt and olive oil or brine, sometimes flavoured with natural seasonings.

Furthermore, numerous controls across the supply chain, the scrupulous selection of raw materials and an avantgarde production process make our range of canned fish a good, practical alternative to fresh fish as well as one that's safe and sustainable.

Three false myths to debunk



Preserves without preservatives

The word 'preserve' could be misleading: in fact, none of Rio Mare's products **contain either additives or preservatives**. Only high-quality fish seasoned with olive oil and a pinch of salt, in accordance with Mediterranean tradition. The sterilization process guarantees that it's correctly preserved, making it a practical serving of preseasoned, ready-to-eat fish.



Mercury: no problem

There's tuna and tuna: perhaps not everyone knows that the species used in the Italian canning process (Yellowfin and Skipjack) are among the species containing the lowest percentage of heavy metals. The authorities recomend to consume fish 2 per week changing the species.

Rio Mare's added guarantee: ongoing controls on the raw materials and finished product show that the mercury values contained in Rio Mare tuna are 10 times lower than the safety limits established by law. For this reason, the consumption of Rio Mare tuna is recommended for everyone, including pregnant women and children, in compliance with the limits imposed by the health authorities.



Salt: less than you think

The individual who consumes a can of 80 g of canned tuna introduces 0.4 g of salt (not even 10% of the recommended daily salt consumption by health authorities, which equals 5 g / day). **Studies based on portion intake and weekly consumption frequency have shown that canned fish should not be considered a determinant source of salt intake.** In fact, a high percentage of people's daily salt intake derives from the salt 'hidden' in several transformed food products including bread, biscuits, breakfast cereals and snacks.



Innovation dedicated to sustainability and proper nutrition

Bolton Alimentari and Saupiquet believe that innovation is a key concept that should be applied to the nutritional properties of its products and ingredients, the design of its packaging in order to reduce environmental impact and increase recyclability and re-use, and the fishing methods used.

Some examples of product innovation:

Rio Mare Leggero

Rio Mare Leggero is a tender, firm-textured Yellowfin tuna that is characterized by a reduced fat content. It contains 60% less fat than drained tuna in olive oil because it only contains a drizzle of extra virgin olive oil.

Rio Mare SuperNaturale

Rio Mare SuperNaturale only contains 0.5% fat and is an excellent source of noble proteins whose goodness will surprise you because it only contains a drop of water. It's practical because, like Rio Mare Leggero, it's a no-drain tuna.

Pole & Line

Rio Mare Pole & Line tuna is a product based on an artisanal, selective and environmentally-friendly method that is still practiced today in developing countries. Pole & Line fishing is a sustainable method that involves a reduced risk of bycatch because the fish are caught one by one.



Rio Mare and Saupiquet Grilled Mackerel Fillets

High in Omega-3, Grilled Mackerel Fillets are an ideal choice for a varied, balanced diet. The innovative factor lies in the production process as the grilling process takes place directly in the can.

Rio Mare and Saupiquet Sardine Fillets

White and firmly textured, without skin or bones, Rio Mare and Saupiquet's Sardine Fillets are packed with Omega-3 and protein. They are carefully selected by hand and enriched with the delicate flavour of olive oil or the distinctive flavour of a whole chili pepper.

MSC certified Rio Mare Linea Bio

This product proudly features 100% guaranteed MSC certified Yellowfin tuna (MSC being the world's most important program for sustainable fishing) and is canned in organically certified extra virgin olive oil.

MSC certified Rio Mare Insalatissime Bio

The insalatissime Linea BIO are ideal for those looking to enjoy a complete, healthy meal containing all the protein of the best Rio Mare tuna and all the nutritional properties of a variety of carefully selected, 100% organic grains, pulses and vegetables.

Rio Mare Grilled Salmon Fillet

Lightly grilled, without preservatives, Rio Mare's carefully selected, premium-quality Salmon Fillet contains no skin or bones. Its pink flesh is packed with Omega-3, noble proteins, phosphorous, iodine, vitamin B12 and vitamin D.

Saupiquet Aperò

In 2017, Saupiquet launched a new range of patè and shellfish to enrich its assortment of cocktail snacks. Its tuna patè products are packed with protein.



Promoting proper nutrition daily

A varied, balanced diet combined with an active life style plays an essential role in the prevention of commonly-named 'lifestyle diseases', including cardiovascular diseases, diabetes and obesity, that are becoming increasingly widespread in the western world.

In this context, the **Mediterranean Diet**, in which fish plays a crucial role, is a healthy nutritional model that should be promoted and recommended. Scientific evidence shows how, when eaten in the right quantity, this food can help maintain and improve people's health.

As an Italian company, Bolton Alimentari acknowledges and promotes respect for dietary traditions and the gastronomic history of this country. Bearing this in mind, it has identified the Mediterranean diet as a recommended nutritional model because:

- → It promotes a balanced diet that includes fish among the foods recommended;
- → It promotes the conscious consumption of foods based on their availability;
- → It recommends the consumption of food in the right quantity and ratio, promoting a balanced consumption and the avoidance of excess and waste;
- → it combines proper nutrition with a healthy lifestyle:
- → It represents an ideal dietary model for people of all ages;
- → It contributes to preventing the incidence

of chronic diseases (e.g. cardiovascular disease, diabetes and obesity) thanks to the anti-oxidant and preventative power of the food that it comprises, including a reduced intake of saturated fats, mainly mono and polyunsaturated fats;

- → It promotes conviviality at mealtimes;
- → It guarantees the right balance between man and nature

Increasing the awareness of fish consumption

Data on fish consumption show how eating habits differ from the recommended intake for health¹⁸. In fact, when comparing the guidelines recommended by the Mediterranean Diet, a failure to achieve the recommended weekly intake was noted.

In order to increase consumption and allow consumers to access the benefits of fish, the positive role played by cured fish emerged. A staple of the food culture of the Mediterranean people since ancient times, in addition to having a comparable nutritional composition to fresh fish, it is an extremely practical and versatile dietary option.

With a view to raising awareness and encouraging people to increase their dietary intake of fish, it is necessary to

 Processing from INDIS (National Distribution and Services Institution) sources on Eurostat, Istat and Ismea data; and from Doxa/ANCIT (National Fish Curing and Canning and Tuna Fisheries Association) data, 2016,







Proper nutrtion

promote its consumption and find concrete solutions. The current low level of fish consumption contradicts the positive findings in terms of health benefits. For this reason, it is important to help consumers make aware choices

Bearing this in mind, Bolton Alimentari is concretely committed to:

- promoting fish consumption with the aim of allowing everyone to enjoy its important nutritional properties;
- → raising awareness among consumers about the health benefits associated with fish, particularly species that are rich in Omega-3 fatty acids (like tuna, sardines and mackerel, salmon, anchovies and herring), which improve cardiovascular health and the functioning of the neuro-cognitive system;
- paying ongoing attention to the dietary requirements of all its consumers by continually researching and developing product lines with specific characteristics that are tailored to suit all requirements. Thanks to its Research and Development department, Bolton Alimentari continuously analyses the ingredients contained in its products based on new scientific nutritional findings, including the reduction of salt intake.

To achieve these objectives, we decided to engage in a series of initiatives and collaborations guaranteeing our commitment to promoting a healthy diet inspired by the principles of the Mediterranean diet.

Institutional partnerships and educational projects

Every year, our Research and Development team conducts studies with relevant institutional partners to gain a deeper understanding of the nutritional properties of canned fish.

At the national level, we have been members of the **Nutrition Foundation of Italy** (NFI) for many years. The NFI is a non-profit organization recognized as an authority in food sector research. In collaboration with NFI we conduct periodic surveys with the aim of assessing the nutritional benefits of our products and discovering new ones.

We also participate and sponsor events and activities dedicated to healthcare professionals, including the forum of Practical Nutrition 'NutriMi' and the First

Conference on the Mediterranean Diet. The latter, held in July 2016 for the first time, was attended by the world's 30 leading experts on the subject. We also sponsor the National Congress of the Italian Society of Human Nutrition (SINU), which was held in Turin. During the event, three young researchers received awards for the best abstracts presented as first-time authors on topics related to nutrition.



THE MEDITERRANEAN DIET AND OUR PARTNERSHIP WITH THE CAMPAIGN FOR THE PROMOTION OF IFMED'S MEDITERRANEAN DIET

The Mediterranean Diet represents a sustainable dietary model for health and the planet. It is the result of an ancient gastronomic, social and cultural tradition, closely associated with conviviality, seasonal products and food as a family and social ritual. For this reason, in 2010, it acquired UNESCEO 'Intangible Cultural Heritage' status. Bolton Alimentari supports the Mediterranean Diet with specific activities targeted at informing consumers about the nutritional benefits of fish and is a key partner of the European Campaign for the Promotion of the Mediterranean Diet, promoted by IFMeD.

The International Foundation of the Mediterranean Diet (IFMeD)

Is a key international player dedicated to scientific research on Mediterranean food culture. Established in 2014, IFMeD is a hub of multi-disciplinary knowledge and expertise, internationally recognized for its re-evaluation of the Mediterranean Diet. In this role, the Foundation publishes annual reports and research on the nutritional benefits of the Mediterranean Diet, whose results are presented at dedicated national and global events.

IFMeD's objective is the 360-degree promotion of the Mediterranean Diet, creating added value for the entire community: institutions, universities and research centres, industries and consumers. The Foundation aims to raise public awareness about a healthy, sustainable diet and to promote international cooperation agreements among private and public players to support and advance the values and benefits of the Mediterranean Diet.



NEW PICTORIAL PROPOSAL FOR AN ENVIRONMENTAL, SUSTAINABLE MEDITERRANEAN DIET



p=portion

Serving or portion size based on frugality and local habits

Regular physical activity Adequate rest Conviviality Wine (and other alcoholic fermented beverages) in moderation and respecting social beliefs









© 2016 International Foundation of Mediterranean Diet Author: Scientific Advisory Committee of IFMeD

The use and promotion of this pyramid is allowed without any restriction

THE 'NUTRITION AND HEALTH' CAMPAIGN

In 2016, we participated in the 'Nutrition and Health' campaign organized by the Italian 'Giuoco Calcio' Federation and the National Amateurs' League under the patronage of the Prime Minister's Presidential Board to promote proper nutrition for children and youngsters playing football.

In 2016, the campaign involved the distribution of information material (information pamphlets for families and a technical manual for coaches) and the organization of 20 regional conventions dedicated to coaches. This initiative involved more than 1,400, 000 families, 1,200,000 children and youngsters from the age of five, plus 200,000 managers, trainers and coaches.

In 2017, the Campaign was renewed in collaboration with CONI and the Medical Sports Federation, and targeted at 4,500 sports physicians, directly reaching one million athletes and their families (competitive and noncompetitive athletes from the age of seven), plus 2 million patients who pass through the waiting rooms of 100 affiliated FMSI (Italian Medical Sports Federation) centres and the private rooms of FMSI affiliated healthcare practitioners on a yearly basis.









Our commitment to proper nutrition



To offer products that meet the highest qualitative and nutritional standards

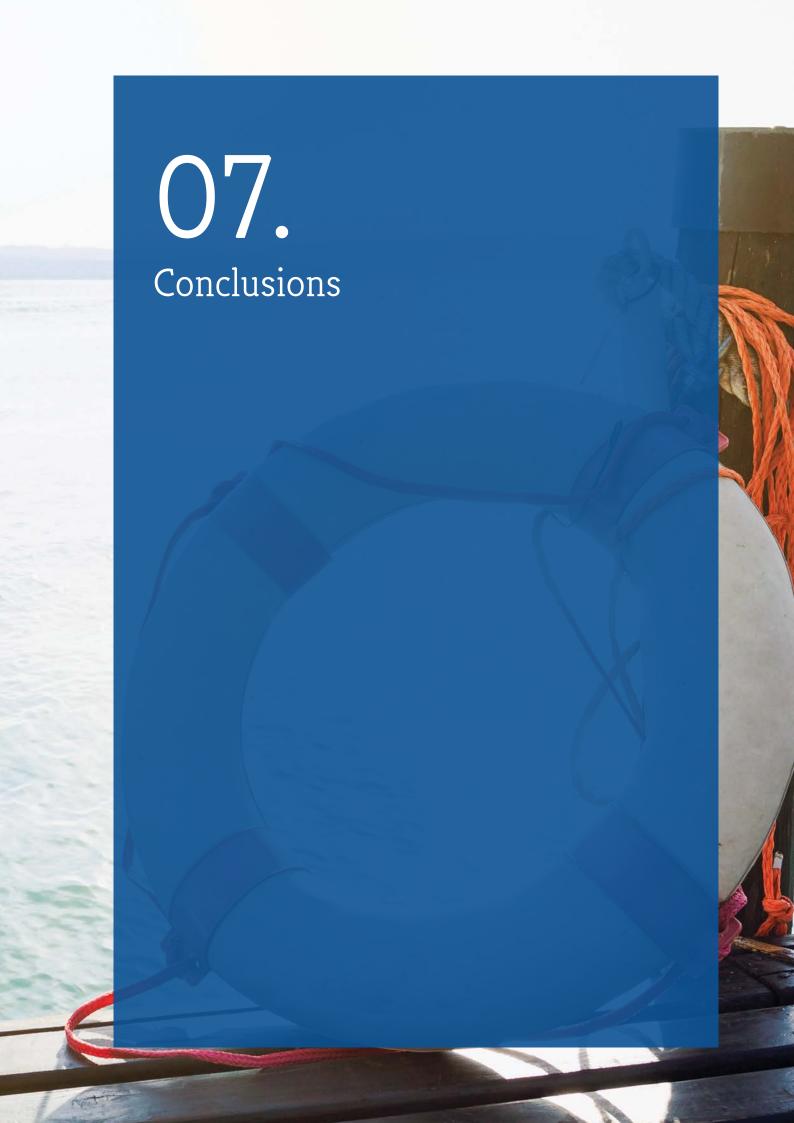
- → Develop nutritional guidelines that are applicable to all our products
- → Apply nutritional assessment criteria to product innovation projects



Promote a sustainable lifestyle

- → Develop communication campaigns targeted at consumers to promote fish consumption
- → Display information related to the nutritional benefits of our products on our packaging
- → Participate and support initiatives targeted at the medical profession and universities





The challenges ahead

Sustainable development means pursuing a course that involves making day-to-day choices that are capable of reconciling social and environmental expectations with economic ones. The latter requirement leads us to measure ourselves against the technical and organizational feasibility of solutions that must be pursued over time, by optimizing the resources available to us. For this reason, every year, we focus our efforts on the most promising fronts in order to guarantee concrete progress capable of supporting our CSR program in the long term

As a consequence, for each area of commitment we have identified several goals that will constitute our **short-term objectives.** These commitments will represent answers to topics of a more material nature that we hope will allow us to achieve increasingly significant progress over the next few years.



A strong governance that puts sustainability at its core

First and foremost, we will dedicate ourselves more strongly than ever before to the implementation of our **new sustainability governance** designed to integrate CSR into our corporate strategy: a condition that represents the best guarantee to achieve the goals that we have set ourselves.

Our new governance will also help us integrate the new member of the Bolton Group, Garavilla, into our policies.



Towards 100% sustainable fishing

As regards fishing, we will focus on a **roadmap for sustainable procurement** and the achievement - in the medium term - of significant percentages, not only in terms of tuna but also the other species that we use. Furthermore, we intend to use **our vessels as areas for best practice experimentation** which, in the future, we hope to disseminate across our supply chain. Where fishing is concerned, we are working towards strengthening our commitment to **protecting protected areas**, which, in the case of the sea, could represent repopulation areas for several of the most widely fished species.



Low impact production

Although the environmental impact of our production processes is not particularly high, we are planning in the short term to increase our efforts to improve energy efficiency by implementing a **co-generation project** that will involve our main production plant. As regards greenhouse gases, we are committed to increasing our **procurement of paper from forests that are managed sustainably** with the end goal of no longer contributing to any type of deforestation.



Rights and opportunities

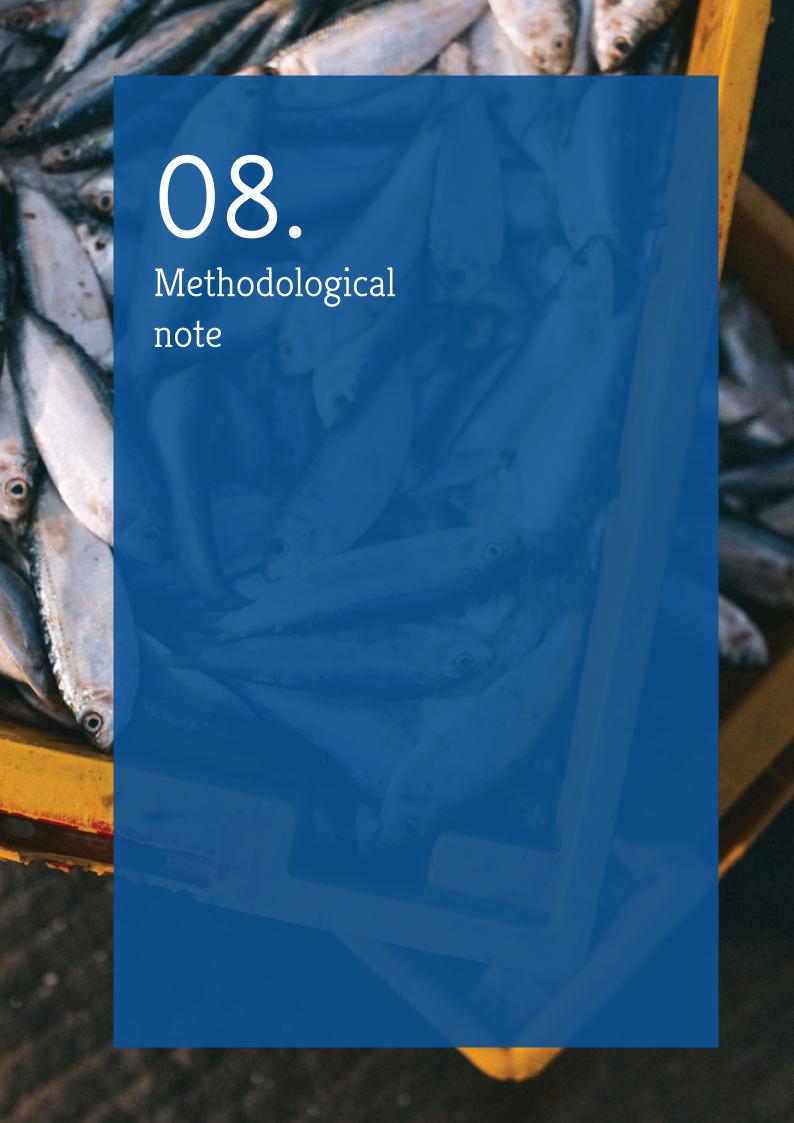
As regards our focus on people, we will monitor **respect for human rights across our supply chain** and develop nutritional guidelines on which our future product innovation process will be based.

Lastly, since these goals would not have been attainable without the contribution of **our colleagues**, we will expressly commit to **improving their levels of satisfaction and involvement**, both through projects aimed at guaranteeing **health and safety in the workplace** and programs targeted at the development and **improvement of work-life quality.**









Methodological note

This document constitutes Bolton Alimentari S.P.A.'s third Socio-Environmental Report and is a follow-up to the first two editions published respectively in 2011 and 2014. This document complies with the guidelines of the Global Reporting Initiative (GRI), the international benchmark on non-financial sustainability reporting, as outlined in the *Food Processing Sector Disclosures*, which include additional matters to be addressed in reports issued by companies engaged in the food processing sector.

Bolton Alimentari's Socio-Environmental Report constitutes a key tool for corporate sustainability performance reporting, highlighting our commitment, initiatives and ongoing stakeholders' dialogue and listening process. Our objective is to report the progress made by Bolton Alimentari in the three-year period between 2014-2017, by identifying current areas of improvement and establishing new commitments that will act as the cornerstone of corporate activity in the years to come.

This document summarizes the sustainability performance of the Rio Mare, Palmera and Saupiquet brands owned by Bolton Alimentari, which today is part of the Bolton Food division together with Simmenthal and Grupo Conservas Garavilla. This document is valid for all countries in which Bolton Alimentari is present with the Rio Mare, Palmera and Saupiquet brands. The data, initiatives and actions outlined refer to the period from 1

January 2014 to 31 December 2017. This Report contains some information about Bolton Group as a whole, which was included in the text to contextualize Bolton Alimentari's activities in a broader strategic context. However, it also mentions several projects and activities implemented during the previous three-year period (2011-2013) which fell within the time frame analysed in the report.

In accordance with GRI guidelines, topics addressed in this issue of the report deemed to be key to the company and its stakeholders, were determined based on the outcome of a materiality analysis.

Stakeholder engagement and materiality analysis

Over the past few years, Bolton Alimentari has worked towards identifying and mapping the requirements of its stakeholders. This has resulted in the establishment of an open, constructive dialogue with all stakeholders involved. Their requirements, viewpoints and assessments have been integrated into corporate strategies and decisions, and over the years, stakeholder engagement initiatives aimed at developing long-term relationships with stakeholders have multiplied.

The table below outlines the company's main stakeholder categories, the communication channels used to listen to their needs and the issues that are most relevant thereto.



Stakeholder	Engagement channels	Relevant topics → Integration of sustainability into corporate processes → Involvement in the definition of material topics → Corporate welfare → Sustainability topics		
Employees	 → Internal questionnaires and surveys → Bolton 4 You platform 			
Consumers	→ Brand's digital channels→ Market research	 → Promotion of proper nutrition and healthy lifestyles → Sustainability topics → Product quality and safety → Information shown on packaging 		
Suppliers	→ Periodic one-to-one meetings	 → Improvement of environmental performance → Traceability across the supply chain → Food quality and safety → Respect for human rights across the supply chain → Presence of sustainability policies 		
Scientific Community	→ Conventions→ Partnerships to develop studies and research	 → Promotion of healthy lifestyles and proper nutrition → Product innovation → Information shown on labels → Ad hoc studies to demonstrate the benefits of our products 		
Environmental organizations	→ Periodic one-to-one meetings	 → Respect for the environment across the entire supply chain → Sustainable fishing methods → Product traceability and sustainability → Respect for human rights across the entire supply chain 		
Large-scale- retail-trade	 → Periodic one-to-one meetings → Activities in partnership with retailers on sustainability → Surveys to assess retailer satisfaction 	 Nutritional benefits of products Topics related to product sustainability Product innovation Partnerships to educate consumers about the benefits of a healthy diet 		
Control bodies	→ Inspections and audits→ Periodic one-to-one meetings	 → Maintenance of compliance regulations at plant level → Environmental performance and impacts on local communities 		
Local Authorities	 → Institutional meetings → Partnerships for philanthropic initiatives 	 → Development and economic growth on a local level → Initiatives to benefit the community 		
Local Communities	→ Philanthropic initiatives	 → Socio-economic impacts of plants → Generation of indirect jobs → Initiatives to benefit the community 		
Shareholders	→ Internal meetings	→ Economic performance→ Corporate sustainability performance		



In accounting terminology, **materiality** is an issue or indicator that is particularly significant and relevant for the company reporting it and, as such, requires an assessment of the accuracy of the reporting thereon in accordance with a specific standard (like the GRI). In order to identify these indicators, a materiality analysis, based on the indications set out in the GRI guidelines, was conducted.

In order to understand the operative and strategic context within which Bolton Alimentari works and to describe the company's key environmental, economic and social impacts, this analysis began with the identification of a first list of the most relevant topics related to sustainability. Topic identification was conducted based on an internal assessment of Bolton Alimentari's business and in compliance with the requirements outlined in GRI guidelines. The selection of topics was enhanced with a benchmark analysis and a comparison with topics identified as relevant by the *Sustainability Accounting Standards Board* (SASB) for the "Consumption - Processed Foods" sector.

Sustainability Accounting Standards Board (SASB)

Is a non-profit organization whose aim is to develop and share sustainability reporting standards. An interactive materiality matrix - broken down by industry sector - which identifies the main relevant topics for companies active in each sector, is available on the SASB website (https://www.sasb.org/).

Following the selection of a long-list of topics considered relevant for the company and its stakeholders, interviews with several external and internal stakeholders were conducted. These interviews involved attributing a quantitative score to the topics listed in order to identify those considered priorities, i.e. so-called 'material' topics.

The matrix shown below represents the output of the analysis of the interviews, while the sections highlighted in yellow indicate the material topics on which the company focused its sustainability reporting. Topics are divided into five areas which represent the five pillars of Bolton Alimentari's sustainability strategy: governance, sustainable fishing and protection of the marine ecosystem, the environment, people and proper nutrition.





BOLTON ALIMENTARI'S MATERIALITY MATRIX





Calculation methodologies

CHAPTER ON PEOPLE:

As regards injuries, the **index of seriousness** measures the number of working days lost due to injury and is calculated as the ratio between the total number of working days lost and total working days, multiplied by 1,000,000. On the other hand, the **frequency index** corresponds to the ratio between the total number of injuries and hours worked, multiplied by 1,000,000.

The **turnover rate** was calculated by comparing the number of resignations handed in during the course of the year with the average number of employees registered at the end of each year considered.

CHAPTER ON THE ENVIRONMENT:

As regards greenhouse gas emissions, the conversion factors considered to calculate direct and indirect emissions were as follows:

Direct emissions of greenhouse gases

Type of greenhouse gas

Conversion factor

Carbon dioxide (CO_2)

Italy: As regards the CO₂ emissions (Scope 1) relative to the Cermenate plant, the data communicated to the Ministry of the Environment within the context of the Emissions Trading Scheme (ETS)19 were taken into consideration. However, in order to calculate the CO₂ emissions relative to the Via Pirelli headquarters we used the 0.2678 conversion from KWh of diesel fuel to kg of CO₂ (source: Department for Environment, Food & Rural Affairs - DEFRA, the conversion factor pertaining to "100% Mineral Diesel") and the 0.20405 factor from KWh of natural gas to kg CO, (source: Department for Environment, Food & Rural Affairs - DEFRA)

France: To calculate CO₂, the 55.8 conversion factor from GJ of natural gas to kg CO₂ was used to calculate CO₂ emissions (source: Agence de l'Environnement et de la Maîtrise de l'Énergie - ADEME)

Methane (CH_{4})

Italy: To calculate methane, we used the 0.00030 conversion factor from KWh of diesel fuel to kg of CO, (source: Department for Environment, Food & Rural Affairs - DEFRA, conversion factor pertaining to "Gas Oil"), the 0.00006 factor from kWh of Diesel to kg of CO, (source: Department for Environment, Food & Rural Affairs - DEFRA, the conversion factor pertaining to "100% Mineral Diesel") and the 0.00028 factor from KWh of natural gas to kg of CO₂ (source: Department for Environment, Food & Rural Affairs - DEFRA)

France: To calculate methane, the 0.15 conversion factor from natural Gas to kg CO₂ was used (source: Agence de l'Environnement et de la Maîtrise de l'Énergie - ADEME)

Nitrous oxide $(N_{2}O)$

Italy: To calculate N₂O, we used the 0.02387 conversion factor from KWh of diesel fuel to kg of CO₂ (source: Department for Environment, Food & Rural Affairs - DEFRA, the conversion factor pertaining to "Gas Oil"), the 0.0021 factor from KWh of Diesel to kg of CO, (source: Department for Environment, Food & Rural Affairs - DEFRA, conversion factor pertaining to "100% Mineral Diesel") and the 0.00011 factor from KWh of natural gas to kg of CO, (source: Department for Environment, Food & Rural Affairs - DEFRA)

France: To calculate nitrous oxide the 0.663 conversion factor from GJ of natural Gas to kg CO, was used (source: Agence de l'Environnement et de la Maîtrise de l'Énergie - ADEME)

Sulphur hexafloride (SF_c)

Italy/France: To calculate SF6 we used the 0.20444 conversion factor from KWh of natural gas to kg of CO, eq. (source: Department for Environment, Food & Rural Affairs - DEFRA). Once the values in kg of CO, eq. had been obtained, they were converted into tons of SF₆ using the conversion factor by which 1 kg of SF₆= 22800 kg of CO₂ eq. (source: Department for Environment, Food & Rural Affairs - DEFRA)

Nitrogen Trifluoride (NF_3)

Italy/France: To calculate NF₃, we used the 0.20444 conversion factor from KWh of natural gas to kg of CO₂ eq. (source: Department for Environment, Food & Rural Affairs - DEFRA). Once the values in kg of CO, eq. had been obtained, they were converted into tons of NF₃ using the conversion factor by which 1 kg of NF₃= 17200 kg di CO₂ eq. (source: Department for Environment, Food & Rural Affairs - DEFRA & Rural Affairs - DEFRA)







Direct emissions of greenhouse gases (Scope 2)

Type of greenhouse gas

Conversion factor

Carbon dioxide (CO₂)

We used the 1GJ = 90 tons of CO_2 eq. factor for France and the 1GJ = 359 tons of CO_2 eq. for Italy (source: Terna - "International Energy Comparisons" and Agence de l'Environnement et de la Maîtrise de l'Énergie - ADEME). In particular, Scope 2 emissions relative to the Cermenate plant were considered null in that the plant's electricity requirements are certified as originating from renewable sources

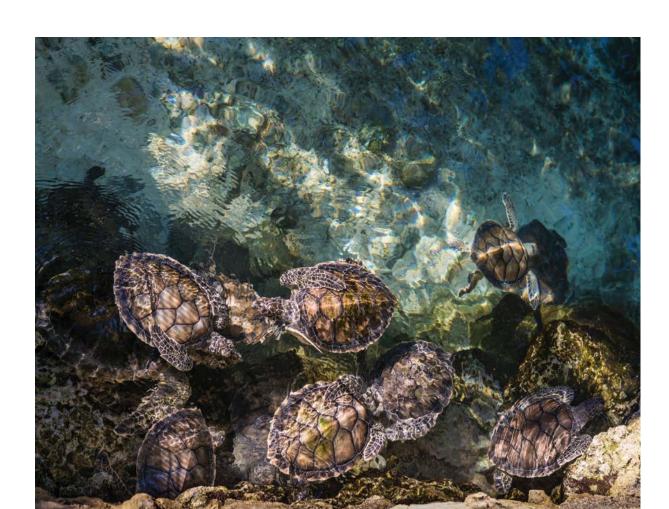
Thanks to our commitment to increase sustainable packaging, the equivalent between the weight of utilitarian vehicles and tons of tinplate saved was obtained by considering the average weight of the five utilitarian vehicles most widely-sold in Italy between June 2016 and May 2017 (source: Ministry of Infrastructure and Transportation, processings: UNRAE, Publieditor).

The last column describes the 'boundary' of application of the material topic, i.e. it indicates the stakeholders most strongly affected by this topic. The boundary is defined as 'internal' if the topic has an impact within the confines of the company itself and 'external' if the topic also impacts external corporate spheres.

BOUNDARY OF MATERIAL TOPICS

The table below shows the positive and negative impacts of each material topic by stakeholder category, with a brief description of the GRI associated topic and indicator.

19) The European Union Emissions Trading Scheme (EU ETS) is the world's first and largest international emissions trading scheme for carbon dioxide. Within this regime, companies receive or buy emission allowances in proportion to their environmental performance which, should the need arise, they can sell to another company that is short of allowances.



Material topic	Description	GRI indicators Associated standards	Boundary
Sustainability governance	Sustainability represents a strategic driver for our company and influences our business-making decisions. For this reason, it is essential to manage sustainability issues using suitable internal governance procedures and the expertise of a dedicated team.	GRI 102: General Disclosures	Internal boundary
Product innovation	We have chosen an approach to innovation consisting of the manufacture of increasingly sustainable products that meet the requirements of our consumers, guaranteeing a lower environmental impact and an ongoing listening process vis-à-vis market requirements.	-	Internal and external boundary (large-scale-retail-trade, consumers and the scientific community)
Economic performance and growth strategies	In order to guarantee the long-term, sustainable economic growth of our company, we must focus maximum attention on current performance and adopt timely, well-defined growth strategies.	GRI 201: Economic Performance	Internal and external boundary (shareholders)
Sustainable fishing methods	We believe that it is essential to continue working towards sustainable fishing, adopting fishing methods that have a reduced environmental impact.	GRI 301: Materials G4-FP1: Percentage of purchased raw material volume from suppliers compliant with corporate policies	External boundary (environmental organizations, suppliers and consumers)
Protection of biodiversity and the marine ecosystem	In addition to guaranteeing the use of sustainable fishing methods and full traceability of our products, we proactively commit to protecting the marine ecosystem, as demonstrated by activities conducted with the ISSF and the project to protect the Protected Marine Area of the Aegadian Islands.	GRI 304: Biodiversity	External boundary (environmental organizations and local communities)







Material topic	Description	GRI indicators Associated standards	Boundary
Sustainability certifications	The obtainment of sustainability certifications, like the certification issued by the Marine Stewardship Council, strengthen our credibility in the eyes of our consumers and guarantee maximum protection of all aspects related to sustainability across the supply chain. Furthermore, within a framework of offering our consumers maximum transparency and ensuring the complete sustainability of our procurements, we are highly committed to tracing the route of each and every one of our products along the supply chain, from boat to plate.	G4-FP2: Percentage of purchased raw material volume compliant with international sustainability standards G4-FP1: Percentage of purchased raw material volume from suppliers compliant with the company's procurement policy	Internal and external boundary (suppliers, environmental organizations)
Product quality and safety	Our company believes that guaranteeing the maximum safety of the products that we launch on the market is crucial. For this reason, we conduct stringent controls on all the raw materials and products entering and leaving our plants.	GRI 416: Customer Health and Safety G4-FP5: Percentage of finished product originating from sites certified by independent companies in relation to their health and safety performance	External boundary (consumers, large-scale-retail-trade and health authorities)
Information shown on products and labels	Within a framework of meeting the needs of consumers who want to know the origin and properties of the products which they purchase, we strive to provide detailed information on our packaging.	GRI 417: Marketing and Labeling	External boundary (consumers, large-scale- retail-trade and controlling authorities)
Promotion of good nutrition and healthy lifestyles	Our proactive commitment to spread the culture of correct dietary habits, our involvement in projects like Nutrition is Health or our partnership with IFMed and the promotion of healthy lifestyles, is one of our company's distinguishing features, testifying to our desire to foster the wellbeing of our consumers.	-	External boundary (consumers, large-scale-retail-trade and the scientific community)
Customer Satisfaction	A high level of customer satisfaction is a point of pride for our company and confirmation that we are following a correct protocol. For this reason, we pay maximum attention to the needs of our customers and the feedback provided by them with regard to our performance.	GRI 102: General Disclosures	External boundary (consumers and large-scale-retail- trade)



Material topic	Description	GRI indicators Associated standards	Boundary
Integrated management of environmental impacts	To guarantee the continuous reduction of the environmental impacts of our plants, we implement the widespread, judicious management of various impact typologies to protect the environment and the community.	GRI 302: Energy GRI 303: Water GRI 305: Emissions GRI 306: Effluents and waste	External boundary (controlling bodies, local communities and local authorities)
Sustainable packaging	Sustainable packaging, in terms of reducing thicknesses and the use of recycled materials, is one of our main spheres of focus vis-à-vis innovation, with the objective of further reducing the environmental impacts associated with our finished products.	GRI 301: Materials	External boundary (consumers and suppliers)
Protecting human rights across the supply chain	Protecting the human rights of workers across the supply chain is one of our key priorities. We therefore ask all our suppliers to endorse the contents of our Human Rights Policy.	GRI 412: Human Rights Assessment	External boundary (suppliers, environmental organizations)
Health and safety in the workplace	We believe that guaranteeing the health and safety of our employees is a strategic priority. For this reason, we implement training activities and initiatives targeted at improving the efficiency of our plants and reducing occupational injury.	GRI 403: Occupational Health and Safety	Internal boundary
Workplace quality	We continually strive to offer our resources a high-quality, stimulating working environment. To achieve this, we develop new corporate welfare initiatives every year.	GRI 401: Employment	Internal boundary
Training and fostering talent	We are aware that professional growth is a key driver for the success of our resources and the company.	GRI 401: Employment	Internal boundary







GRI - Content Index

CDI Combont In d			
GRI Content Ind GRI-G4 Code indicator	Description of indicator	References / notes	Omissions
1. Company pro	file		
102-1	Name of organization	The Bolton Group's commitment to sustainability, a daily spacing/our results in the quest for responsible quality	-
102-2	Activities, brands, products and services	Who we are	-
102-3	Location of the organization's headquarters	Who we are	-
102-4	Main location of operations	Who we are	-
102-6	Markets served (including geographic analysis, sectors served, client typologies and beneficiaries)	Who we are	-
102-7	Scale of the organization	Who we are	Figures have not been provided for quantities of finished products and for the debt and equity components of the capital structure. Bolton Alimentari undertakes to collect all the information needed for this indicator in coming years
102-8	Information on employees and other workers	Our people	-
102-9	Description of the supply chain	From sea to consumer: the cornerstone of our supply chain	-
102-10	Significant changes during the reporting period concerning the organisation's size, structure, ownership and supply chain	Our people	Non vi sono stati cambiamenti di rilievo nel periodo 2014- 2016 in relazione alla struttura dell'azienda, al suo assetto proprietario e alla supply chain
102-11	An explanation of the possible method of application of the Precautionary Principle or Approach	Sustainability of our production processes	-



GRI Content Inc	lex		
GRI-G4 Code indicator	Description of indicator	References / notes	Omissions
102-12	Endorsement or adoption of standards, initiatives or papers drawn up by external entities addressing economic, environmental and social performance	Sustainable tuna fishing	-
102-13	Participation in national and/or international trade associations	Sustainable tuna fishing	-
Strategy			
102-14	Statement from the senior decision- maker on the importance of sustainability for the organization and its strategy	Bolton Group's sustainability, a daily choice/our results in the quest for responsible quality	
102-15	Description of the main impacts, risks and opportunities	The reasons for our commitment/ fishing and protection of the marine eco-system/sustainability within our production processes/respect for people/proper nutrition and who we are	-
Ethics and integ	grity		
102-16	Description of the organization's mission, principles, values and norms of behaviour	Who we are	
102-17			
Governance			
102-18	Organization's governance structure, including the committees that report to the highest governance body	Who we are	
102-21	Consultation of stakeholders on economic, environmental and social issues		
Stakeholder en	gagement		
102-40	List of stakeholders	Methodological note	
102-41	Collective bargaining agreements	All our employees are covered by collective bargaining agreements	
102-42	Identifying and selecting stakeholders	Methodological note	-
102-43	Organizational approach to stakeholder engagement activities	Methodological note	-







GRI Content Ind	ex		
GRI-G4 Code indicator	Description of indicator	References / notes	Omissions
102-44	List of key topics that emerged from stakeholder engagement activities and description of how the organization responds	Methodological note	-
Reporting pract	ices		
102-45	List of entities included in the consolidated financial statements or equivalent documents	Methodological note	
102-46	Explanation of the process for the determination of the content of the sustainability report and the manner in which the organisation has implemented the relevant reporting standards	Methodological note	-
102-47	List of material topics identified	Methodological note	-
102-48	Explanation of the effect of any amendment made to previous reports and reason for said amendment	-	There were no significant amendments with respect to previous editions of the report
102-49	Explanation of the most significant changes in terms of objectives and scope	-	There were no significant amendments with respect to previous editions of the report
102-50	Reporting period	Methodological note	
102-51	Date of the most recent report	Methodological note	
102-52	Reporting cycle	Methodological note	
102-53	Contact point for questions regarding the report and its contents	Back cover	-
102-54	Compliance with GRI guidelines	Methodological note	-
102-55	External assessment policies and procedures on the social sustainability relationship	-	This document was not subjected to external assessment
2. Economic per	formance indicators		
Economic perfo	rmance		
201	Management approach disclosures	Who we are	-
201-1	Economic value generated, distributed and retained	Who we are	-



GRI Content Ind	ex		
GRI-G4 Code indicator	Description of indicator	References / notes	Omissions
Procurement pr	actices and tenders		
G4-DMA	Disclosures on management approach	From sea to consumer: the cornerstone of the supply chain	-
G4-FP1	Percentage of purchased raw material volume from suppliers compliant with corporate policies	From sea to consumer: the cornerstone of the supply chain	100% of the products that we purchase is compliant with our internal purchasing policies
G4-FP2	Percentage of purchased raw material volume compliant with international sustainability standards	Fishing and protection of the marine ecosystem	-
3. Environmenta	performance indicators		
Raw materials			
301	Management approach disclosures	The sustainability of our production processes	-
301-1	Volume of raw materials used	The sustainability of our production processes/ proper nutrition	-
302-2	Percentage of raw materials recycled out of the raw materials used	The sustainability of our production processes/ proper nutrition	-
Energy			
302	Management approach disclosures	The sustainability of our production processes	-
302-1	Energy consumption within the organization	Our plant performance	-
Water			
303	Management approach disclosures	The sustainability of our production processes	-
303-1	Total water withdrawal by source	Our plant performance	-
Biodiversity			
304	Management approach disclosures	Fishing and protection of the marine ecosystem	-
304-3	Natural habitats protected or restored	Fishing and protection of the marine ecosystem.	The natural marine reserve of the Aegadian Islands has a sea surface area of 53,992 ha







GRI Content Inc	lex		
GRI-G4 Code indicator	Description of indicator	References / notes	Omission
Emissions			
305	Management approach disclosures	The sustainability of our production processes	-
305-1	Direct GHG emissions (Scope 1)	Our plant performance	-
305-2	Indirect GHG emissions (Scope 2)	Our plant performance	-
Waste			
306	Management approach disclosures	The sustainability of our production processes	-
306-1	Total water discharge by destination and treatment typology	Our plant performance	-
306-2	Total weight of waste produced by type and disposal method	Our plant performance	-
4. Social perfor	mance indicators		
Employees			
401	Management approach disclosures	Respect for people	-
401-1	Number and rate of new hires broken down by age and gender	Our people	
Occupational h	ealth and safety		
403	Management approach disclosures	Il rispetto delle persone	-
403-2	Rate of workplace injury, occupational diseases, lost days and absenteeism, and total number of work-related fatalities, broken down by geographic area and gender	Our people	-
Training and ed	ucation		
404	Management approach disclosures	Respect for people	-
404-1	Average hours of training received by our employees broken down by gender and category	Our people	-
404-2	Skill updating programs	Our people	
404-3	Percentage of employees involved in periodic performance assessments	Our people	
Diversity and e	qual opportunity		
405	Management approach disclosures	Respect for people	-
405-1	Breakdown of the highest corporate governance body by gender and breakdown of the workforce by gender	Who we are/our people	-



GRI Content Ind	ex		
GRI-G4 Code indicator	Description of indicator	References / notes	Omissions
4. Social perform	mance indicators		
Local communit	ies		
413	Management approach disclosures	Respect for people	-
413-1	Percentage of operations conducted with the involvement of local communities, based on an impact assessment or local development programs	The responsible supply chain and our business model/our commitment to the supply chain and local communities	-
413-2	Sites owned by the company associated with current or potential negative impacts on local communities		The only negative impacts on local communities associated with corporate activities are olfactory pollution and the discharge of waste water related to the Quimper plant. Corresponding mitigation measures are reported in the chapter on 'Sustainability within our production processes'
Supplier assessi	ment based on social criteria		
414	Management approach disclosures	The Responsible Supply Chain and our business model	-
414-1	New suppliers subjected to assessments based on social criteria	The Responsible Supply Chain and our business model	
414-2	Assessment of negative social impacts within the supply chain and programs undertaken	The Responsible Supply Chain and our business model	100% of our products are subjected to health and safety controls
5. Product respo	onsibility		
Consumer healt	h and safety		
416	Management approach disclosures	Proper nutrition	-
416-1	Assessment of impacts on health and safety by product and service category	Our safe, healthy and quality products	100% of our products are subjected to health and safety controls







GRI Content Ind	ex		
GRI-G4 Code indicator	Description of indicator	References / notes	Omissions
Information sho	wn on products and services		
417	Management approach disclosures	Fishing and protection of the marine ecosystem/the sustainability of our production processes/proper nutrition	-
417-1	Type of information shown on our product packaging and percentage of products subjected to said information requisites	The sustainability of our production processes/proper nutrition	

