

Brands' Commitment to Sustainable and Socially Responsible Seafood





Sustainable Seafood Policy Seafood Sourcing Statement



Headquarters Milan, Italy

OVERVIEW

Commitment to Sustainable Seafood

76% of products sold in 2022 met commitment.

Sustainability Commitment. Rio Mare's sustainable seafood commitment is informed by its parent company, Bolton Food, and supported by its NGO partner, WWF International and WWF Italy. Bolton's commitment is comprised of three goals: 1) Preserve and improve the health of oceans and fish stocks. This means that 100% of the tuna sourced by Bolton Food will be fished from MSC certified fisheries first or from fisheries taking part in credible and comprehensive Fishery Improvement Projects (FIPs) when MSC certified tuna is not available, and 100% of the other fish species sourced by Bolton Food (Salmon, Mackerel and Sardines) will come from MSC/ASC fishing activities first or from FIPs/AIPs when MSC/ASC certified products are not available by 2024. More details on Goal #1 can be found here. Bolton Food reported to SeaChoice that 76% of its Rio Mare products by volume were in line with this commitment in 2021, 2) Guarantee transparency from boat to plate. This means extending Bolton's advanced boat-to-plate traceability system which is completely digital from tuna to all species, and adding information on species, ocean of catch, FAO area and fishing method on all product labels and provide real-time communication on traceability on its website by 2024, and 3) Promote seafood market positive change. This means continuing to form partnerships with NGOs, engaging stakeholders on its commitment and educating consumers on responsible purchasing.



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Social Responsibility Commitment. Rio Mare's social responsibility commitment, which is informed by its parent company, Bolton Food, and supported by its NGO partner, WWF International and WWF Italy, is to ensure that human rights are respected throughout its supply chain by requiring suppliers to endorse and respect the principles outlined in its Ethics Code and its **Human Rights Policy**. Its Human Rights Policy is informed by the International Labour Organization (ILO). Its website also states that, since 2017, Bolton's Tuna Policy has required suppliers to comply with ILO CI88 standards to protect and promote human rights within the fishing industry. Bolton is also the first company in the world to have partnered with Oxfam to

Clear Objectives

Supplier Expectations

Traceability Policy

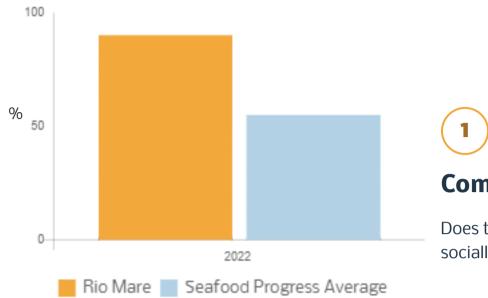
Reporting on Activities

raise the standards that protect human rights in the global tuna supply chain.

Generate Report - SeaChoice

Sometime in 2022 Bolton Food will be releasing the results of a human rights impact assessment of its supply chain conducted in partnership with Oxfam as well as its next steps in relation to those results.

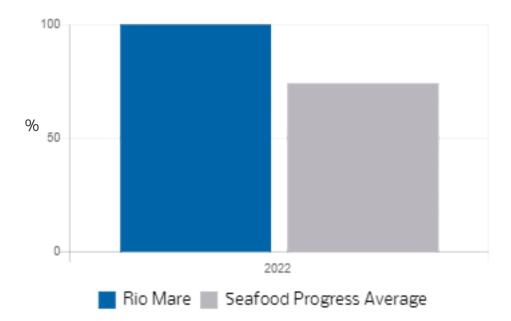
STEP 1: COMMITMENT



Commitment

Does the brand have comprehensive commitments to sustainable and socially responsible seafood?

1.1 The brand has a publicly available commitment regarding environmentally sustainable seafood.



Rio Mare's sustainable seafood commitment is informed by its parent company, Bolton Food, and is supported by its NGO partner, WWF International and WWF Italy. According to its website and <u>The WWF & Bolton Food Partnership Progress Report</u>, Bolton's commitment is comprised of three goals: **1)** Preserve and improve the health of oceans and fish stocks. This means that 100% of the tuna sourced by Bolton Food will be fished from MSC certified fisheries first or from fisheries taking part in credible and comprehensive Fishery Improvement Projects (FIPs) when MSC certified tuna is not available, and 100% of the other fish species sourced by Bolton Food (Salmon, Mackerel and Sardines) will come from MSC/ASC fishing activities first or from FIPs/AIPs when MSC/ASC certified products are not available by 2024. More details on Goal #1 can be found <u>here</u>. Bolton Food reported to SeaChoice that **76%** of its Rio Mare products by volume were in line with this commitment in 2021, **2) Guarantee transparency from boat to plate.** This means extending Bolton's advanced boat-to-plate traceability system which is completely digital from tuna to all species, and adding information on species, ocean of catch, FAO area and fishing method on all product labels and provide real-time communication on traceability on its website by 2024, and **3) Promote seafood market positive change.** This means continuing to form partnerships with NGOs, engaging stakeholders on its commitment and educating consumers on responsible purchasing.

Scoring

100% Commitment to environmental sustainability includes clear objectives that are supported by references to credible standards, a full chain traceability policy and a timeline for meeting the commitment (unless the commitment has already been met).

80% Commitment to environmental sustainability that includes clear objectives that are supported by references to credible standards and a full chain traceability policy that traces at least the product scientific name, geographic origin, farmed/wild and gear type or farming method.

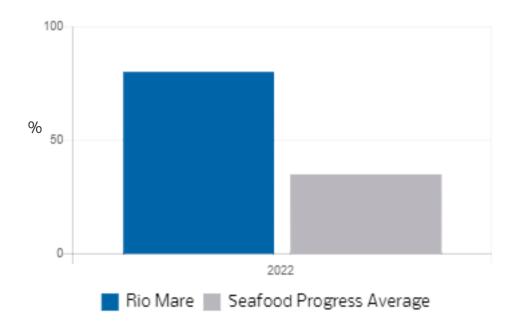
60% Commitment to environmental sustainability that includes clear objectives that are supported by references to credible standards (such as Seafood Watch or Ocean Wise ratings, eco-certifications, etc.).

40% Commitment to environmental sustainability that includes clear objectives for sustainable procurement.

20% General commitment to environmentally sustainable seafood.

o% No publicly available environmental sustainability commitment.

1.2 The brand has a publicly available commitment regarding socially responsible seafood.



Rio Mare's social responsibility commitment, which is informed by its parent company, Bolton Food, and supported by its NGO partner, WWF International and WWF Italy, is to ensure that human rights are respected throughout its supply chain by requiring suppliers to endorse and respect the principles outlined in its <u>Ethics Code</u> and its <u>Human Rights Policy</u>. Its Human Rights Policy is informed by the International Labour Organization (ILO). Its website also states that, since 2017, Bolton's Tuna Policy has required suppliers to comply with ILO CI88 standards to protect and promote human rights within the fishing industry. Bolton is also the first company in the world to have partnered with Oxfam to raise the standards that protect human rights in the global tuna supply chain. Sometime in 2022 Bolton Food will be releasing the results of a human rights impact assessment of its supply chain conducted in parternship with Oxfam and its next steps in relation to those results (personal communication, L. Pirovano, 28/02/2022).

Scoring

100% Commitment to social responsibility includes clear objectives, actions or expectations for seafood suppliers, a clear and effective traceability policy, and the grocer reports publicly on activities to support social responsibility.

80% Commitment to social responsibility includes clear objectives, actions or expectations for seafood suppliers, and a clear and effective traceability policy.

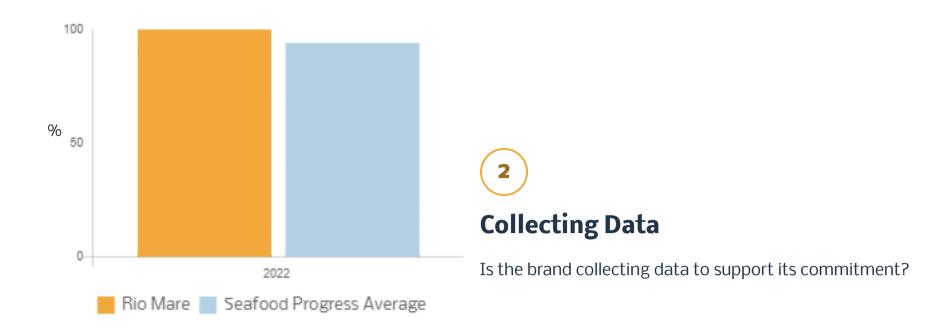
60% Commitment to social responsibility includes clear objectives and actions or expectations for seafood suppliers.

40% Commitment to social responsibility includes clear objectives for socially responsible procurement (for example by referring to credible international standards such as ILO, UN Declaration, etc.).

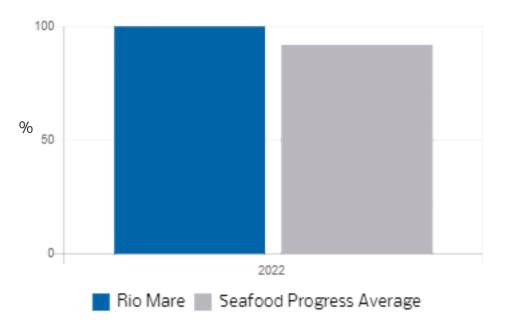
20% General commitment to socially responsible seafood.

o% No publicly available social responsibility commitment.

STEP 2: COLLECTING DATA

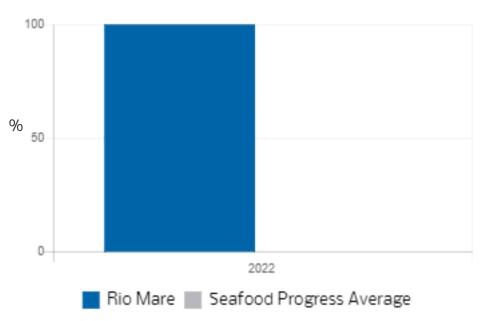


2.1 The brand collects data on species scientific name.



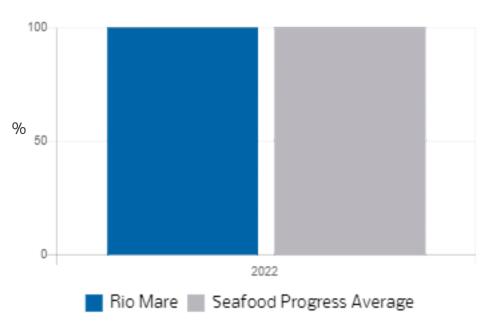
Rio Mare collects data on species' scientific name for all products (personal communication, L. Pirovano, 28/02/2022).

2.2 The brand collects data on geographic origin.



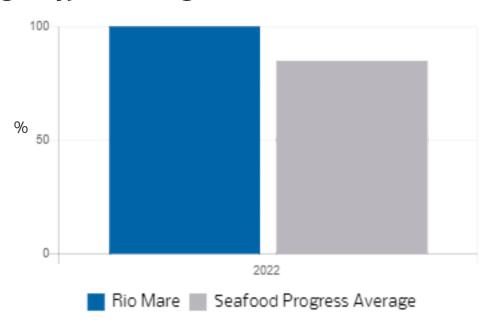
Rio Mare collects data on geographic origin for all products (personal communication, L. Pirovano, 28/02/2022).

2.3 The brand collects data on whether wild or farmed.



Rio Mare collects data on whether wild or farmed for all products (personal communication, L. Pirovano, 28/02/2022).

2.4 The brand collects data on gear type or farming methods.

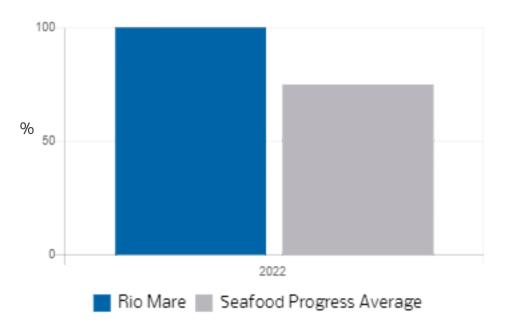


Rio Mare collects data on gear type and farming method for all products (personal communication, L. Pirovano, 28/02/2022).

STEP 3: SOURCING



3.1 Company publishes a clear hierarchy demonstrating its sourcing priorities.



Rio Mare publishes a clear hierarchy of sustainability standards demonstrating its sourcing priorities for all commodities it sells.

Scoring

100% Publishes a clear hierarchy of sustainability standards demonstrating its sourcing priorities for all commodities it sells.

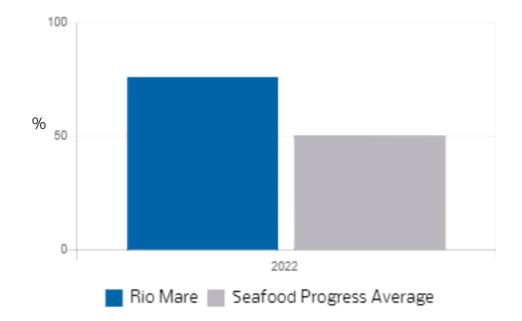
75% Publishes a clear hierarchy of sustainability standards used for sourcing some commodities, and identifies a general list of sustainability standards that it uses to inform its purchasing decisions for other commodities.

50% Publishes a clear hierarchy of sustainability standards used for sourcing some commodities, but doesn't identify the standards it uses to inform its purchasing decisions for other commodities.

25% Publishes a general list of sustainability standards that it uses to inform its purchasing decisions.

o% Does not publish the sustainability standards that it uses to inform its purchasing decisions.

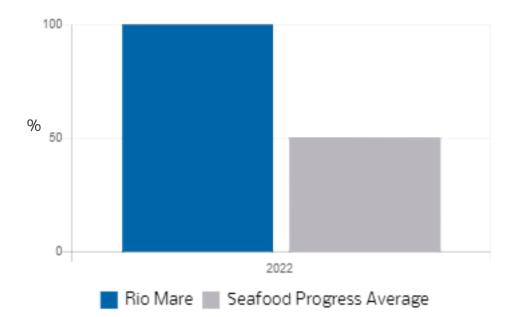
3.2 The brand has reported on the percentage of seafood sold in the past year that meets its sustainability commitment by volume or value.



Through its Seafood Progress profile, Bolton Food reported that 76% of its Rio Mare products by volume were in line with its commitment in 2021 (personal communication, S. Combra, 27/03/2022).

Scoring	+
100% Grocery store has reported that 100% of its seafood sold meets its sustainability commitment.	
75% Grocery store has reported that 75% or more of its seafood sold meets its sustainability commitment.	
50% Grocery store has reported that 50% or more of its seafood sold meets its sustainability commitment.	
25% Grocery store has reported that 25% or more of its seafood sold meets its sustainability commitment.	
o% Grocery store has not reported on the percentage of its seafood sold that meets its sustainability commitment (or no information available).	

3.3 Suppliers are required to sign a code of conduct to uphold the brand's environmental sustainability commitment.



According to its <u>Year 2 Progress Report</u>, all tuna suppliers are expected to comply with its <u>Tuna Supply Policy</u> which covers its tunafocused commitments. Bolton Food verifies that this commitment is being upheld by conducting internal assessments and annual third party audits. Bolton Food also requires its sardine, mackerel and salmon suppliers to sign commodity-specific policies that cover all of its environmental sustainability commitment. The company actively verifies compliance through product inspections upon receipt and DNA testing on a regular basis (personal communication, L. Pirovano, 28/02/2022).

Scoring

100% All suppliers are required to sign a code of conduct that covers all of the retailer's environmental sustainability commitment and the retailer actively verifies that this commitment is being upheld on at least an annual basis.

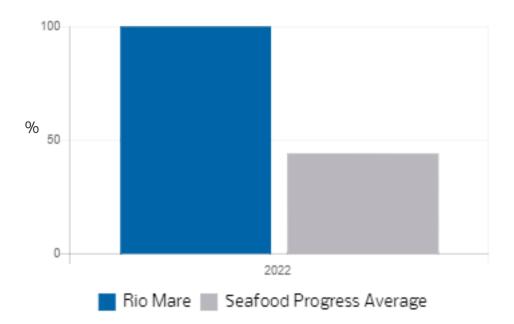
75% Rubric for retailers Feb 17 2022 Rubric for retailers Feb 17 2022 .XLSX 100% 10 B84 All suppliers are required to sign a code of conduct that covers all of the retailer's environmental sustainability commitment. Screen reader support enabled. All suppliers are required to sign a code of conduct that covers all of the retailer's environmental sustainability commental sustainability commitment. Turn on screen reader support

50% Rubric for retailers Feb 17 2022 Rubric for retailers Feb 17 2022 .XLSX 100% 10 B83 All suppliers are required to sign a code of conduct that covers some of the retailer's environmental sustainability commitment. Screen reader support enabled. All suppliers are required to sign a code of conduct that covers some of the retailer's environmental sustainability commitment. Turn on screen reader support

25% Some suppliers are required to sign a code of conduct that covers some of the retailer's environmental sustainability commitment.

o% Suppliers are required to sign a code of conduct to uphold the grocery store's environmental sustainability commitment.

3.4 Suppliers are required to sign a code of conduct to uphold the brand's social responsibility commitment.



According to its <u>Year 2 Progress Report</u>, all of Bolton Food's suppliers are required to comply with its <u>Ethics Code</u> and <u>Human Rights</u> <u>Policy</u>, and all its tuna suppliers are required to comply with its <u>Vessels Code of Conduct for Tuna Suppliers</u> and its <u>Tuna Supply</u> <u>Policy</u>. It also states that all of these documents are "an integral part of the Bolton Food quality management system ISO9001:2015 that is subject to internal assessment and annual audit from a third party certification body (DNV GL)."

Scoring

100% All suppliers are required to sign a code of conduct that covers all of the retailer's social responsibility commitment and the retailer actively verifies that this commitment is being upheld on at least an annual basis.

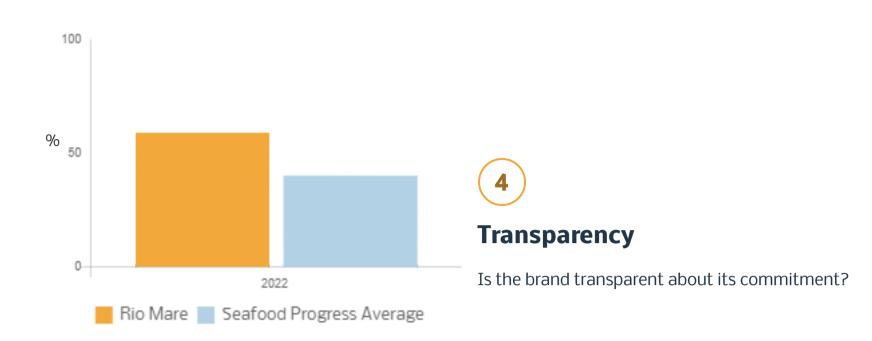
75% Rubric for retailers Feb 17 2022 Rubric for retailers Feb 17 2022 .XLSX 100% 10 B92 All suppliers are required to sign a code of conduct that covers all of the retailer's social responsibility commitment. Screen reader support enabled. All suppliers are required to sign a code of conduct that covers all of the retailer's social responsibility commitment. Turn on screen reader support support

50% All suppliers are required to sign a code of conduct that covers some of the grocery store's social responsibility commitment.

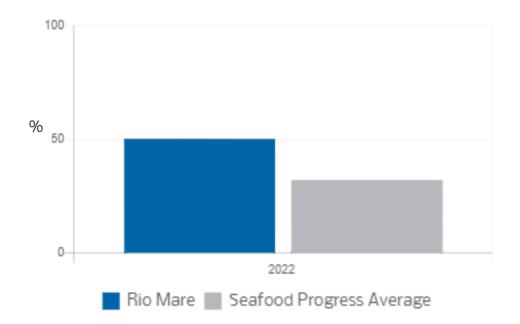
25% Some suppliers are required to sign a code of conduct that covers some of the grocery store's social responsibility commitment.

o% Suppliers are not required to sign a code of conduct (or no information).

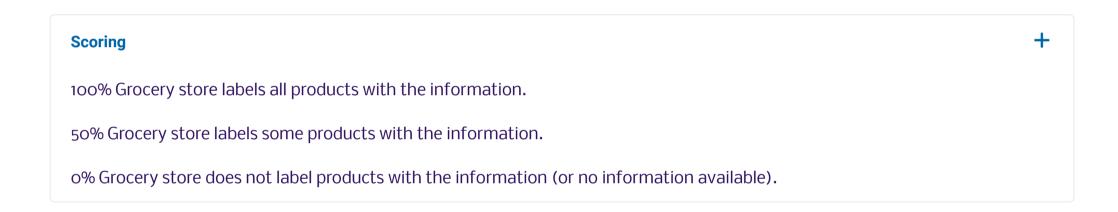
STEP 4: TRANSPARENCY



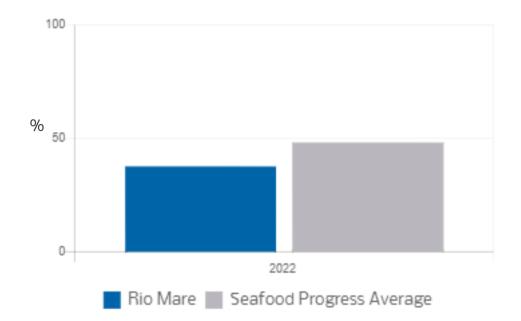
4.1 The brand labels products with the information that allows consumers to make informed decisions.



Rio Mare labels all products with species' scientific name and some products with geographic origin and gear type or farming method. Rio Mare does not label any products as wild or farmed. However, Bolton Food is committed to adding all of these key data elements to all product labels by 2024 (personal communication, L. Pirovano, 28/02/2022).



4.2 The brand follows best practice guidelines for making environmental claims on its products.



Rio Mare uses its "Responsible Quality" self claim on all products and makes sourcing information publicly available to back up this claim for all tuna products, but not for salmon, sardines and mackerel products (personal communication, L. Pirovano, 28/02/2022). Additionally, its self claim does not adhere to ISO14021 Type II guidance due to the use of vague language and the fact that it is not accompanied by an explanatory statement. Rio Mare also uses the MSC certification claim on some of its product labels which includes chain of custody to serve as evidence to back up its claim.

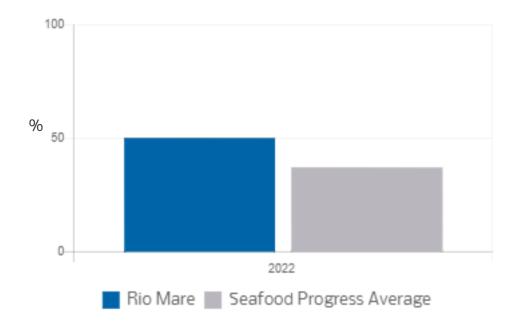
Scoring

100% Grocery store labels all products with an ecolabel as appropriate.

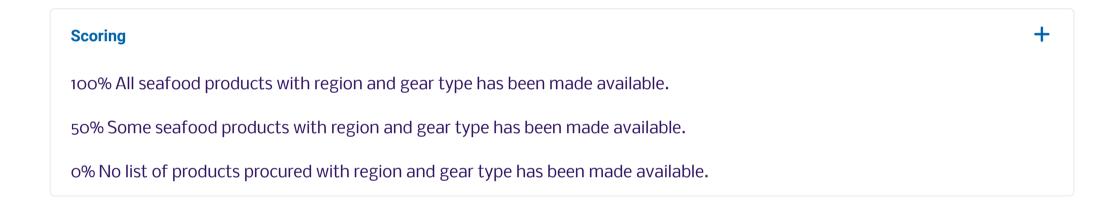
50% Grocery store labels some products with an ecolabel as appropriate.

o% Grocery store does not label products with an ecolabel as appropriate (or no information available).

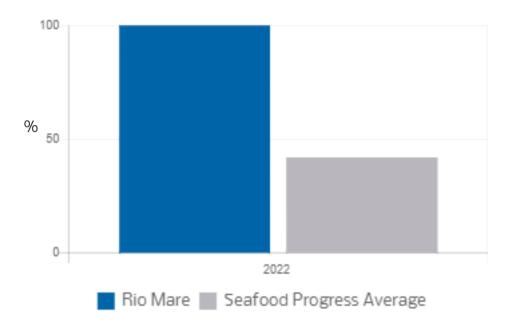
4.3 Scientific name, geographic origin and harvest method of the brand's products is publicly available.



Rio Mare shares the scientific name, geographic origin and harvest method of all its tuna products through the "**Traceability**" page on its website, and intends to share this information on all its other products by 2024 (personal communication, L. Pirovano, 28/02/2022).



4.4 The brand publicly reports how much of its seafood meets its sustainability criteria by volume or value of sales.



Through its Seafood Progress profile, Bolton Food reported on the percentage of Rio Mare brand products sold that were in line with its commitment by volume (74% in 2020, and 76% in 2021) (personal communication, S. Combra, 27/03/2022).

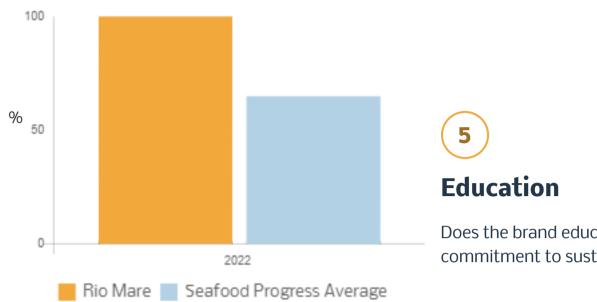
Scoring

100% Retailer regularly reports publicly how much of its seafood sold meets its commitment by volume or value of sales every year.

50% Rubric for retailers Feb 17 2022 Rubric for retailers Feb 17 2022 .XLSX 100% 10 B123 Retailer has at one point reported publicly how much of its seafood sold meets its commitment. Screen reader support enabled. Retailer has at one point reported publicly how much of its seafood sold meets its commitment. Turn on screen reader support

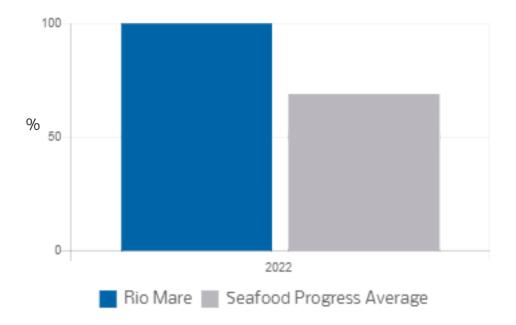
o% No public information on how the grocery store is doing to meet its commitment.

STEP 5: EDUCATION



Does the brand educate key stakeholders about the importance of its commitment to sustainable seafood?

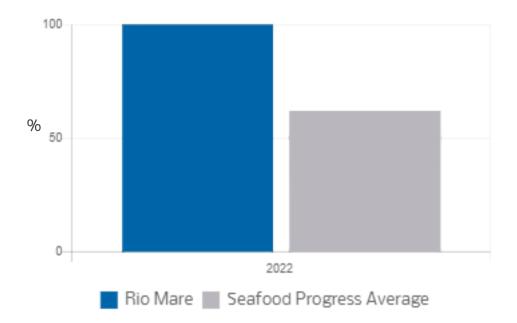
5.1 There is a description of the brand's commitments to sustainable and socially responsible seafood on its website.



Rio Mare's website links directly to Bolton Food's **<u>Responsible Quality website</u>** which provides comprehensive descriptions of its commitments to sustainable and socially responsible seafood.

Scoring	+
100% Training programs regularly conducted for all seafood staff.	
75% Training programs conducted for all seafood staff, but only once.	
50% Training programs sometimes conducted or for only some seafood staff.	
o% Training programs not conducted for seafood staff (or no information available).	

5.2 The brand has taken actions to ensure its suppliers are aware of its sustainable seafood commitment or policy.



Bolton shares its sustainability commitment with all its suppliers through its commodity-specific policies that they are required to sign and uphold. The company also periodically meets with its main supplier, Tri Marine, to ensure its **policy** aligns with Bolton's and to follow up on progress. Bolton works with all other suppliers on a regular basis to address compliance problems and to help guide them on reporting against the company's sustainability requirements (personal communication, L. Pirovano, 28/02/2022).

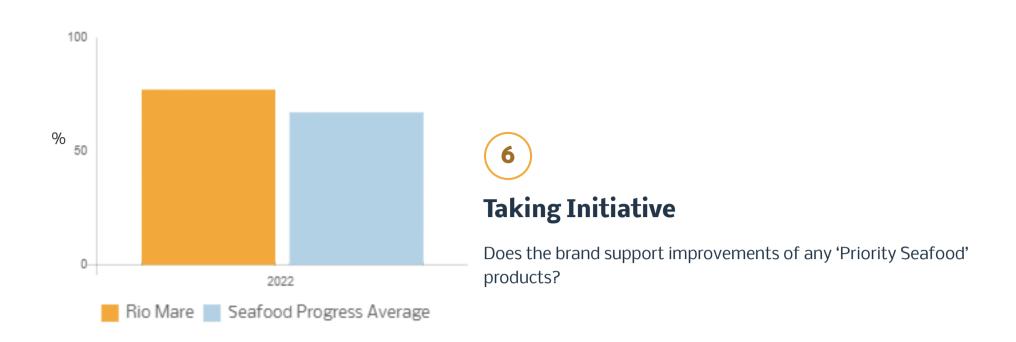
Scoring

100% There is a comprehensive description of the grocery store's commitments to sustainable and socially responsible seafood in store.

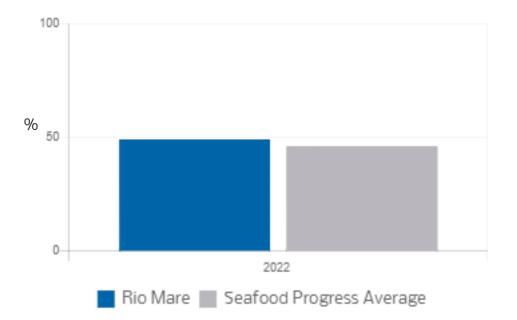
50% There is some description of the grocery store's commitment to sustainable seafood and/or socially responsible seafood in store.

o% There is no description of the grocery store's commitments to sustainable and socially responsible seafood in store.

STEP 6: TAKING INITIATIVE



6.1 Farmed Atlantic salmon (either Canadian produced or imported)

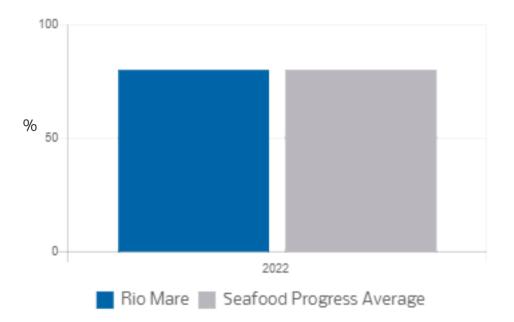


Bolton Food preferentially procures farmed Atlantic salmon that is ASC certified or from an Aquaculture Improvement Project (AIP) and is committed to not selling any genetically engineered or modified farmed salmon (personal communication, L. Pirovano, 28/02/2022).

- Only sells farmed salmon products that meet the highest bars for sustainability, i.e. are produced in a closed containment facility, certified by ASC, Recommended by Ocean Wise and/or rated Best Choice by Seafood Watch (100 pts).
- Conducts outreach to policymakers and/or certifying bodies to advocate for salmon farming management to be more environmentally sustainable (25 pts).
- Works with suppliers or producers directly to improve salmon farming practices and/or to support their transition from open-net systems to closed containment systems (25 pts).
- Preferentially procures farmed salmon from closed containment producers and sources that are ASC certified, Recommended by Ocean Wise or rated Best Choice by Seafood Watch (25 pts).

Does not sell genetically engineered (GE) or genetically modified (GM) farmed salmon (25 pts).

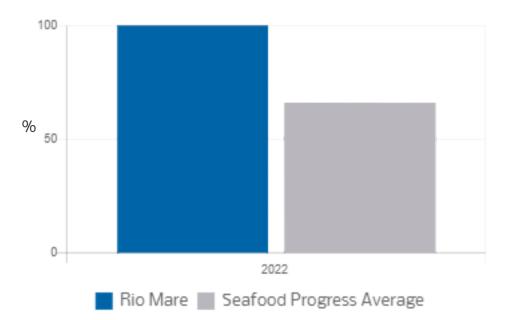
6.3 Skipjack tuna (bonito) - Katsuwonus pelamis.



In October 2021, Bolton Food Group signed on to <u>a public letter</u> coordinated by the NGO Tuna Forum to the Western and Central Pacific Fisheries Commission (WCPFC) regarding harvest strategies for tuna stocks. Bolton Food is a founding member and active participant of the International Seafood Sustainability Foundation (ISSF), and is currently involved with the Sulawesi yellowfin and skipjack tuna Fishery Improvement Project (FIP). Finally, Bolton prioritizes traceability with its advanced system that allows all products to be traced from the the fishing area and boat to the supermarket shelf (personal communication, L. Pirovano, 28/02/2022).

- Only sells pole and line caught skipjack tuna products that meet the highest bars for sustainability, i.e. are MSC certified, Recommended by Ocean Wise and/or rated Best Choice by Seafood Watch (100 pts).
- Conducts outreach to policymakers and/or certifying bodies to advocate for skipjack fishing methods and management to be more environmentally sustainable (20 pts).
- Collaborates with other companies pre-competitively to improve skipjack fishery management practices (20 pts).
- Works with suppliers or producers directly to improve skipjack fishing practices (20 pts).
- Preferentially sources pole and line caught skipjack tuna products that meet the highest bars for sustainability, i.e. are MSC certified, Recommended by Ocean Wise and/or rated Best Choice by Seafood Watch (20 pts).
- Priorititizes sourcing products with high levels of social responsibility and traceability (20 pts).

6.4 Other seafood products.



Bolton Food Group is a new member of the North Atlantic Pelagic Advocacy (NAPA) Group. Through this group, it conducts outreach to policy makers to support improvements to mackerel, herring and blue whiting management. The company also collaborates precompetitively with other companies through the Global Dialogue on Seafood Traceability (GDST). According to its Year 2 Progress Report, Bolton Food is committed to increasing sourcing of sardines and mackerel from Robust FIPs and to support the advancement of fisheries towards reaching MSC standards. Finally, the company prioritizes sourcing MSC and ASC certified products and has an advanced traceability system for all products (personal communication, L. Pirovano, 28/02/2022).

- Only sells versions of this product that meet the highest bars for sustainability, i.e. are certified by MSC/ASC, Recommended by Ocean Wise and/or rated Best Choice by Seafood Watch (100 pts).
- Conducts outreach to policymakers and/or certifying bodies to advocate for harvest or farming method and management to be more environmentally sustainable (20 pts).
- Collaborates with other companies pre-competitively to improve fishing or aquaculture practices (20 pts).
- Works with suppliers or producers directly to improve fishing or farming practices (20 pts).
- Preferentially sources from more sustainable sources that are MSC/ASC certified, Recommended by Ocean Wise or Best Choice by Seafood Watch (20 pts).
- Prioritizes sourcing products with high levels of social responsibility and traceability (20 pts).

SeaChoice is a sustainable seafood partnership of the following three conservation groups:



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