2025 SEAFOOD PROGRESS PROFILE: SOBEYS

Private label brands	Best Buy, C'est Pret, Compliments, Eight Treasures, Panache, Ready for you, Ricardo, Sensations, Thrifty Kitchens Food
Key documents	 Ethical & Sustainable Sourcing Governance Model Ethical & Sustainable Sourcing Policy - July 2024 Fish & Seafood Sourcing Guidelines & Commitments - July 2020 Forced Labour Report - 2024 Sustainable Business Report - 2024
Parent company	Empire Company Ltd.
NGO partner	Ocean Wise
Stores covered by seafood policy	Foodland, FreshCo., IGA, Safeway, Sobeys, Sobeys Wholesale, Thrifty Foods, Voila (e-commerce)
Stores NOT covered by seafood policy	Bonichoix, Boni-Soir, Chalo Freshco, Farm Boy, Kim Phat, Lawtons Drugs, Les Marchés Tradition, Longos, Needs, Rachelle Béry, Voisins





✓ THE GOOD

- Adequate and timely engagement with SeaChoice on environmental questions.
- Has full chain traceability on all private label and third-party direct products (fresh, frozen and shelf stable seafood).
- Policies appear to be well embedded into its operations.

X THE BAD

- 11 of its 19 store chains are NOT covered by Sobeys' Sustainable Seafood Guidelines.
- Lowest coverage of seafood products under its Sustainable Seafood Guidelines and across all retailers at 17%, and no timeline to include third-party seafood.
- Very low engagement with SeaChoice on human rights questions.
- Does not verify supplier compliance against its Sustainable Seafood Guidelines or Supplier Code of Conduct.
- No tangible plans to adopt a human rights due diligence process that incorporates worker perspectives.

SEAFOOD INVESTIGATIONS

Sobeys did not respond to SeaChoice's inquiry about whether the company plans to strengthen its efforts to ensure that its seafood suppliers comply with its Ethical and Sustainable Sourcing Policy amid growing evidence of abuse in global seafood supply chains. In relation to recent seafood investigations, Sobeys was implicated in the Outlaw Ocean Project's China series where human rights and environmental abuses were connected back to seafood products sold by North American retailers. Beyond the company's initial response to Outlaw Ocean (published here), Sobeys has not reported publicly on its efforts to remediate based on the findings of that investigation. Additionally, a supplier of Sobeys' private label seafood, Premier Marine Canada, was implicated (correspondence here), as were various third-party seafood brands that are commonly sold by Sobeys (e.g., Aqua Star, High Line and Toppits).





For the first time, SeaChoice is scoring retailers on indirect products containing seafood-such as pet food and fish oil-and taking a deeper look at how human rights policies are being put into practice. Check out our NEW scoring methodology!



C ENVIRONMENTAL

Did the retailer engage with SeaChoice and respond to questions related to its sustainable seafood policy and practices?

Sobeys provided adequate and timely responses to most questions related to its **Seafood Sourcing Guidelines** and practices.



Which seafood products are covered by the retailer's sustainable seafood policy?

Sobeys received the lowest score on this indicator at 10%. Sobeys informed SeaChoice that its Fish and Seafood Sourcing Guidelines and Commitments cover all private label fresh and frozen and some shelf stable products, but does not cover any third-party fresh, frozen or shelf stable products. Furthermore, it does not cover any health, beauty, pet food or garden products (personal communication, Sobeys, 13/02/2025). Finally, Sobeys declined to share revenue and sales data around its seafood products with SeaChoice.





DIRECT PRODUCTS

Third-party, private label and unbranded shelf stable, frozen and fresh seafood products.





INDIRECT PRODUCTS

Third-party and private label health, beauty, pet food and garden products that contain seafood ingredients (examples **HERE**).



SHELF **STABLE**

FROZEN

FRESH





HEALTH e.g. fish oil

BEAUTY e.g. collagen



PET FOOD

GARDEN e.g. fertilizer





PRIVATE LABEL BRANDS

Products that retailers sell and own.

THIRD-PARTY BRANDS

Products that retailers sell but do not own.

UNBRANDED PRODUCTS

2025 SEAFOOD PROGRESS PROFILE: SOBEYS

Products that retailers typically own but that do not have a brand on pack (e.g. fillets sold through deli counters).

*Note: In calculating the overall score for this indicator, the decision was made to weight direct products at 75% and indirect products at 25% following the assumption that the former amounts to significantly higher volumes of seafood than the latter.

How does the retailer verify supplier compliance against its sustainable seafood policy?

Sobeys achieved the second highest score on this indicator at 66% as it has a full chain traceability policy in place that applies to all seafood (including third-party brands), and the information collected from suppliers is verified by the Sustainable Fisheries Partnership (SFP). Sobeys informed SeaChoice that, through the SFP's Seafood Metrics platform, Sobeys achieved full chain traceability of all the direct seafood it sells (private label, third-party and unbranded) in 2023, and continues to collect information from suppliers on a quarterly basis. Sobeys works closely with the SFP to address gaps in its reporting and to ensure seafood data is accurate (personal communication, Sobeys, 31/01/2025).



KPI 1.4 TRATEGY

What is the retailer's strategy behind the scope of its sustainable seafood policy?

Sobeys scored below average on this indicator as some of its private label direct seafood products are in scope and the retailer's approach to verification is clear, but there's no timebound commitment to include third-party direct products or indirect products. Sobeys informed SeaChoice that its initial focus is on its Own Brand seafood as it has the most control over these products. Sobeys uses its Seafood Metrics initiative, delivered by the Sustainable Fisheries Partnership (SFP), to provide national brand supplier partners a comprehensive understanding of the sustainability risks and opportunities associated with their source fisheries, including both wild-caught and farmed seafood. Businesses can



evaluate the sustainability impacts of fish and seafood products, understand the effectiveness of existing improvement efforts, and prioritize future opportunities. Seafood Metrics also supports traceability within supply chains by enabling suppliers to report place of origin. This empowers suppliers and Sobeys' procurement teams to make informed decisions about the seafood they source and promote more sustainable practices in the industry. Using the data obtained through Seafood Metrics, Sobeys has begun to update its seafood guidelines to be more reflective of the current environmental and social imperatives to ensure our oceans are being fished responsibly (personal communication, Sobeys, 31/o1/2025).

KPI 1.5 OVFRNANCE

Who is held responsible and accountable for ensuring the retailer's sustainable seafood policy is met?

2025 SEAFOOD PROGRESS PROFILE: SOBEYS

Sobeys achieved a perfect score on this indicator as it clearly holds at least two departments responsible and accountable, and a discrete budget is dedicated to the work on its Seafood Guidelines. Sobeys' Ethical and Sustainable Sourcing Governance Model relays that its Corporate Governance and Social Responsibility Committee provides oversight over material ESG issues,



including ethical and responsible sourcing, on a quarterly basis. Additionally, its Executive Leadership Team provides strategic input, oversight and approval on strategic decisions related to ethical and responsible sourcing, and are provided updates on progress against sourcing commitments as needed. The Model also states that its Sustainability Team provides direction and support to business categories on sustainable and ethical sourcing considerations and strategy, leads and supports on related policy development, implementation and governance, manages supply chain evaluation and due diligence for sustainable and ethical considerations, collaborates with internal teams on reporting against sourcing commitments, and engages with industry stakeholders and suppliers on related sourcing topics. Sobeys informed SeaChoice that its sustainable seafood sourcing work is supported by resources within its Corporate Sustainability and Merchandising teams. There are budgets allocated for various initiatives (personal communication, Sobeys, 31/01/2025).



HUMAN RIGHTS

KPI 2.1 NGAGE

Did the retailer engage with SeaChoice and respond to questions related to its human rights policy and practices?

Sobeys scored below average on this indicator as it only provided partial responses to some questions related to its **Ethical and Sustainable Sourcing Policy** and practices.



KPI 2.2 Rification

How does the retailer verify supplier compliance against its human rights policy?

Sobeys scored 'o' on this indicator as it expects suppliers to abide by its Ethical and Sustainable
Sourcing Policy (acts as its Supplier Code of Conduct) but does not verify compliance. Sobeys' Policy states: "suppliers must ensure that their suppliers, contractors, sub-contractors, agents and subagents adopt and meet the requirements outlined in our Ethical and Sustainable Sourcing Policy. Suppliers are expected to complete their own risk assessments and due diligence for suppliers that they source from." Sobeys informed SeaChoice that at this time, it does not have the structure to audit suppliers against its Policy (Sobeys, personal communication, 31/o1/2025.")

SCORE F

KPI 2.3 Trategy

What is the retailer's strategy behind the scope of its human rights policy?

Sobeys achieved a score of 'o' on this indicator as it does not verify supplier compliance against its Ethical and Sustainable Sourcing Policy, and did not report plans to incorporate worker perspectives into its human rights due diligence process in relation to seafood. Empire's (parent company of Sobeys Inc) 2024 Forced Labour Report states: "In fiscal 2025, we will engage in a more detailed supply chain risk-mapping analysis to better understand product categories, sourcing origins, and labour-violation risk areas that might require more investigation and action, with a particular focus on suppliers for Own

SCORE F

risk areas that might require more investigation and action, with a particular focus on suppliers for Own Brands and goods for which we are the importer of record." <u>Sobeys' Human Rights page</u> states: "As we improve our due diligence approach, we will also continue to strengthen existing supplier and purchasing initiatives that support human rights, including our work on...sustainable seafood." SeaChoice asked Sobeys to elaborate on these plans in relation to seafood, but did not receive a response.

KPI 2.4

Who is held responsible and accountable for ensuring the retailer's human rights policy is met?

Sobeys achieved a perfect score on this indicator as it clearly holds at least two departments responsible and accountable, and a discrete budget is dedicated to the work on its Ethical and Sustainable Sourcing Policy. Sobeys' Corporate Governance and Social Responsibility Committee provide oversight over material ESG issues, including ethical and responsible sourcing, on a quarterly basis. Sobeys' Executive Leadership Team provides strategic input, oversight and approval on strategic decisions related to ethical and responsible sourcing, and are provided updates on progress against sourcing commitments as needed. Sobeys' Sustainability Team leads and supports on related policy



development, implementation and governance, and manages supply chain evaluation and due diligence for sustainable and ethical considerations. Finally, Sobeys' sustainable seafood sourcing work is supported by resources within its Corporate Sustainability and Merchandising Teams. There are budgets allocated for various initiatives (personal communication, Sobeys, 31/o1/2025.



2025 SEAFOOD PROGRESS PROFILE: SOBEYS

Please contact SeaChoice for more information at info@seachoice.org

