

Responsible Seafood Sourcing Policy

This policy governs ASL's procurement of **ALL** farmed and wild caught species sourced by the business.

As one of Scotland's leading producers of quality seafood products, we have an obligation to protect the environment which provides our source materials, our operational partners working within supply chains, the reputation and brand integrity of our customers and the expectations of our end consumers who wish to purchase safe, sustainable, and ethical seafood.

At Associated Seafoods, (hereafter referred to as 'ASL') we are committed to building collaborative partnerships across our supply chain which promote improvement in ethical and sustainable working practices, using our influence in the industry to bring positive changes and foster best practice throughout the industry.

We will work alongside our seafood suppliers to ensure that all seafood procured by ASL, whether it be farmed or wild-caught is compliant with national and international regulations, and that we are able to demonstrate compliance with industry best practice measures to ensure the sustainable and responsible production of our products.

ASL takes guidance from the requirements of IPAS1550 and has engaged with Pew Charitable Trusts and undertaken a review of best practice to further advise and develop best practice going forward.

ASL provides all suppliers with a copy of this policy which they are required to sign and return to ASL confirming agreement with the standards of the policy before being approved to supply the business.

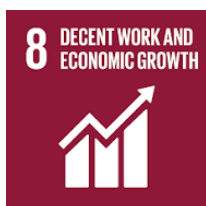
As a business, we recognise the United Nations Sustainable Development Goals.

8: Decent Work and Economic Growth: <https://sdgs.un.org/goals/goal8>

12: Responsible Consumption and Production: <https://sdgs.un.org/goals/goal12>

13: Climate Action: <https://sdgs.un.org/goals/goal13>

14: Life Below Water: <https://sdgs.un.org/goals/goal14>



Sourcing Decisions:

Our seafood is exclusively sourced from trusted businesses meeting the criteria to become an approved supplier prior to supply commencing.

Where species type allows, we prioritise sourcing from fisheries or farms that are certified to third party sustainability standards recognised by the Global Seafood Sustainability Initiative (GSSI). For example, Aquaculture Stewardship Council, Global G.A.P or GAA Best Aquaculture Practice, Marine Stewardship Council or other benchmarked third-party sustainability standard or are part of a Fishery Improvement Project. Where this is not available, we will work with suppliers closely to ensure best practice and management of species.

As members of the Sustainable Seafood Coalition (SSC) we also refer to the SSC's Codes of Conduct, including The Sourcing Code.

Sustainable Seafood Coalition: <https://www.sustainableseafoodcoalition.org/codes-of-conduct/>

For all new suppliers or species, the business will conduct a risk assessment and supply chain review, identifying relevant risks and will only source exclusively from 'low risk' or 'low impact' sources.

For areas of improvement identified via risk assessments, sourcing may be permitted on the basis that an improvement plan is agreed with ASL, depending on the level of risk and collaborative discussions between ASL and the supplier to agree an improvement plan.

ASL will undertake a new risk assessment, where necessary, following any significant changes to the supply chain or process (e.g., changes of ownership, new or different infrastructure, or processing/product handling technologies used).

ASL requires that its suppliers comply with recognised conservation objectives and regulations in cases where fishing or farm activities are conducted within sensitive areas.

Fish farms within the ASL supply chain are required to ensure all feed given to fish derives from a responsible source which is not identified as 'endangered' or 'critically endangered' on the IUCN Red List or CITES Appendices and shall be to the Marine Trust Standard or an otherwise agreed standard. The feed shall not contain any mammalian or avian by-products.

ASL does not condone the genetic modification of seafood, and ASL will not accept any farmed species which has been directly subject to genetic modification.

We process Organic Salmon and source and pack products in line with Soil Association Accreditation requirements.



Animal Welfare:

As a major seafood provider, we recognise our responsibility to protect the welfare and health of all seafood that we source, and that it is our duty to make effective use of our influence in the seafood industry to support, develop, and implement changes which benefit the welfare standards.

We recognise that, like other creatures, fish and crustacea are sentient beings, and we are committed to achieving a better understanding of best practices and ways that we can promote, protect, and improve their welfare within our supply chains. We are members of The Shellfish Association of Great Britain and are working with key industry stakeholders to develop and implement the Industry Codes of Practice to ensure optimal welfare standards for all farmed and wild-caught seafood. A Panel of industry wide members has been created to establish codes of Best Practice for each of the key points within shellfish supply chains. The goal being to ensure that the welfare of these creatures is actively considered and protected at all stages. We continue to work collaboratively with the supply chain to establish best practice and optimise animal welfare together.

We engage with our suppliers and industry to aid development and implementation of effective and humane stunning and slaughtering processes. Technology continues to evolve in this area, and we are committed to supporting the adoption of proven best practice to support animal welfare.

Supporting Industry Collaboration and Initiatives

ASL is a member of, and engages with a wide range of industry forums, groups, and initiatives that aim to drive continual improvement throughout the industry covering a variety of key aspects.

We joined the Sustainable Seafood Coalition in 2020 to collaborate with other businesses and show best practice by implementing their Codes of Conduct on Sourcing and Labelling.

ASL will engage with ongoing Fishery Improvement Projects (FIP's), as well as other industry initiatives and stakeholder projects, where relevant to ASL's supply chain.

We are currently a funding partner and active member of the Project UK FIP for Langoustine (Nephrops Norvegicus) in Scotland.

We are an active member of the North Atlantic Pelagic Advocacy Group (NAPA), a unified voice for the marketplace for sustainable Northeast Atlantic pelagic seafood.

We also participate in the Seafood Ethics Common Language Group (SECLG), which is a collaboration promoting ethical practices in the seafood industry. It develops a common language on ethical issues, focusing on transparency and accountability, traceability, labour rights, animal welfare, and environmental sustainability through stakeholder engagement and information sharing.



Illegal, Unregulated, and Unreported Fishing Practices:

Illegal, Unregulated, and Unreported (IUU) fishing practices are those which are in contravention of legal conservation and management measures. IUU fishing hinders scientific assessments, impairs stock management measures, threatens biological sustainability, and distorts markets. ASL condemns the use of illegal fishing/management practices, which have no place in a modern, sustainable, and responsible seafood industry. ASL operates a zero-tolerance policy towards any businesses convicted of IUU fishing and/or human rights abuses.

We will not knowingly procure from suppliers convicted of, or who currently practice any of the following regarding the catching of seafood:

- Fishing without a license or legal authority
- Non- or miss-reporting of catches
- Exceeding quota limits
- Fishing outside prescribed areas
- Ignoring mandatory minimum conservation reference sizes (MCRS) or equivalent
- Use of banned fishing methods

Additionally, we will not knowingly procure or handle any seafood caught by a fishing vessel identified on the IUU vessel blacklists and will take reasonable precautions to mitigate the chance of IUU seafood entering our supply chains. We are committed to working with the PAS1550 toolbox to inform our risk-based decisions and mitigate the IUU and ethical risks within our seafood supply chains.

Landing Inspections and pre-notification of landings are an important step we use to address IUU fishing practices, and we would expect suppliers to work with us to facilitate this where reasonably practical.

We will not knowingly accept seafood that is smaller than the mandatory minimum conservation reference (MCRS).

Minimum Conservation Reference Sizes:

<https://www.gov.uk/government/publications/minimum-conservation-reference-sizes-mcrs/minimum-conservation-reference-sizes-mcrs-in-uk-waters>

We recognise and endorse the Environmental Justice Foundation's (EJF's) 10 principles for global transparency in seafood supply chains.

Environmental Justice Foundation: <https://ejfoundation.org/what-we-do/oceans/transparency>

Endangered, Threatened and Protected Species:

ASL will not procure, handle, or sell any seafood species that has been identified as 'endangered', 'under threat', or 'protected' in the IUCN red list or CITES Appendices or deemed "Avoid" within the Good Fish Guide by The Marine Conservation Society.

ASL will not knowingly trade with any business directly, or indirectly, involved in the targeted capture and/or slaughter of non-seafood species such as marine mammals, sea turtles, or is involved in the practice of shark finning.

IUCN Red List: <https://www.iucnredlist.org/>

CITES Appendices: <https://cites.org/eng/app/index.php>

MCS Good Fish Guide: <https://www.mcsuk.org/goodfishguide/>

Social and Ethical Standards:

We undertake reviews of active suppliers to ensure compliance and encourage joining the Supplier Ethical Data Exchange (SEDEX) including an additional self-assessment for suppliers who do not have a valid 4 Pillar audit. Responses and necessary developments are agreed, evaluated, and monitored with the suppliers.

We work collaboratively with various other organisations to raise working standards across our industry, for example, Stronger Together, making effective use of training and other tools to inform, educate, and support our supply chain as to how we can minimise the risk of modern slavery within the seafood industry and ultimately abolish such practices worldwide.

Stronger Together: <https://www.stronger2gether.org/>



We provide all suppliers with a copy of our Supplier Code of Conduct, which they are required to sign and return, prior to supply commencing.

We will encourage all fishing vessels involved within our supply chain to become actively engaged with appropriate third-party certification schemes, where available, to guarantee ethical best practices regarding vessel management, safety, crew rights, and wellbeing.

We undertake background checks on vessels and captains prior to engagement. Those found to have a history involving IUU fishing or human rights abuse convictions will not be permitted into ASL's supply chain.

Furthermore, it is required that all supply vessels' crew be in possession of a valid and legal work contract which should be available for confidential review by inspectors and set out and aligned with ILO C188 requirements. All crew must also have the appropriate visa to meet current in-country legal requirements in respect of conditions of work.

We are active members of the Seafood Ethics Action Alliance (SEA). SEA Alliance is a pre-competitive collaboration of retailers and seafood businesses aiming to strengthen human rights due diligence carried out in the global seafood supply chain.

We are also members of Food Network for Ethical Trade (FNET). FNET connects major UK food retailers, manufacturers, suppliers, and food companies to enable them to build a more ethical trade by identifying and tackling human rights issues in food supply chains.

The logo for the Seafood Ethics Action Alliance consists of the text "SEAFOOD ETHICS" in a blue, sans-serif font above the text "ACTION ALLIANCE" in a larger, bold, blue, sans-serif font.

Fishing Gear Impacts:

We support the use, development, and innovation of fishing gear types that have lower impacts on the marine environment and are more selective towards the target capture species through the avoidance of non-target catch.

Where environmental impacts from fishing gear are higher, fisheries should be MSC certified or able to demonstrate best practice operation to minimise or improve the impacts (i.e., through active participation in a Fishery Improvement Project).

ASL will not accept any species that come from fisheries or farms that are involved in irreversible damage to the marine environment.

Furthermore, we do not approve of, nor source seafood from fisheries or farms that are involved in the use of destructive fishing methods such as the use of dynamite and poison.

Abandoned, lost, or discarded fishing gear from both wild capture fisheries and fish farms impacts on marine wildlife, habitats, and fish stocks. Suppliers of ASL should be aware of and compliant with the Global Ghost Gear Initiatives best practice framework for the management of fishing gear.

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Global Ghost Gear Initiative: <https://www.ghostgear.org/resources>

We support and encourage our supply chain vessels to participate in innovative schemes such as Fishing for Litter or those of a similar nature tackling marine pollution.

ASL is working collaboratively with M&S, a supply partner langoustine vessel and Safety Net Technologies on technological development to improve fishing effort and reduce by-catch through camera and fishing equipment technology. More information on this project is available in the link below.

Camera Technology:

<https://sntech.co.uk/blog/asl-ms-youngs-and-sntech-partner-up-to-support-british-fishermen-to-push-the-ne-scottish-mixed-demersal-fishery-towards-bycatch-reduction-and-msc-certification/>

Supply Chain & Traceability:

We recognise the criticality of traceability throughout the supply chain to protect the integrity and quality of our products. We work with suppliers to achieve full supply-chain traceability back to point of origin (farm, vessel, or known group of vessels). Wild species catch records also include the specific catch area using the FAO's Major Fishing Areas or the areas defined by the International Council for the Exploration of the Seas (ICES). Farmed species will be accompanied with harvest records which detail the farm site of origin and, where possible, cage number(s) should be included.

ASL regularly assesses the integrity of the traceability procedure and verifies the ability to trace back to point of origin within a timely manner if required to do so.

ASL engages with suppliers to undertake end-to-end supply chain reviews and maintains up-to-date supply chain maps for all seafood raw materials. We undertake audits as appropriate within the supply chain and have an ambition that 1st, 2nd and 3rd party inspections and auditing of all stages of the supply chain can be achieved.

ASL has achieved certification under the GSA's Best Seafood Practices (BSP) and Best Aquaculture Practices (BAP) schemes. We are the only UK based primary processing facility to meet the stringent requirements to achieve these certifications.



Transparency:

At ASL we strive for transparency which is one of our stated company values. Transparency of policies, practices, and supply chains is a key part of our business, and we are committed to upholding these values.

We work collaboratively with the supply base to seek full end-to-end supply chain transparency and will, if required, work alongside suppliers to take appropriate corrective actions to maintain or increase transparency throughout the supply chain. Any suppliers deemed not to be supportive of achieving supply chain transparency within a reasonable and agreed timeframe may lose the approval to supply to ASL.

Companies found to be in violation of this policy may not serve as a supplier depending on the severity of the violation. ASL will review and where possible work collaboratively with the supplier to find a remedy if this is a suitable way forward. ASL will also report, if appropriate, any supplier violations to the relevant governing authority.