

Responsible Seafood Sourcing Policy

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

Background: -

Associated Seafoods Limited (referred to as 'ASL') stands as the parent company for three prominent Scottish seafood businesses: Lossie Seafoods Limited, Moray Seafoods Limited, and Loch Fyne Oysters Limited, incorporating Hebridean Mussels, and the owner of SeaSalter (Walney) Limited.

ASL, a distinguished seafood business boasts a rich history and an unwavering commitment to its people, products, and planet, principles which are evident in its diverse product range and operational practices.

Purpose & Scope: -

As one of Scotland's leading producers of quality seafood products, we believe that we have an obligation to not only ourselves, but our customers and end-consumers to ensure our seafood is procured from sustainable sources and ethical suppliers. We are committed to building collaborative partnerships across our supply chain which promote improvement in ethical and sustainable working practices, ensuring crew and animal welfare are a priority, using our influence in the industry to aid positive changes and continuous improvement, always striving for best practices. This policy will be reviewed and updated annually. ASL procures a wide range of species from various locations around the globe and this policy is universal and covers all seafood purchases regardless of country of origin and species, whether procured for own brand or other brand requirements. Corporate Social Responsibility (CSR), incorporating animal, seafood, and crustacean welfare, has Board Level representation in ASL and management and implementation of policy within our business is managed, reviewed and implemented by a cross functional team to ensure awareness, implementation, continuous improvement and support across the group.

Foundation: -

Sustainability is of paramount importance beyond that of sourcing seafood and we seek to ensure that sustainability is a central consideration in all our business decisions, from the sourcing of goods and services to our manufacturing and distribution operations. To guide and align our thinking with sustainability, we recognise the role of the Sustainable Development Goals (SDGs) of the United Nations. Established in 2015, the UN SDGs provide a global agenda to produce a more sustainable future for all. The 17 goals embrace all three pillars of sustainability: economic, social, and environmental. We are working to ensure our business aligns with these goals to help achieve the SDGs by 2030 and recognise that our business currently has the greatest influence on:

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>



Responsible Sourcing: -

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.

Sourcing Decisions: -

Our seafood is exclusively sourced from trusted businesses that have met the criteria to become an approved supplier to the business prior to supply commencing.

Where species type enables us to, we prioritise sourcing from farms or fisheries 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, alternatively we will source from those part of a Fishery Improvement Project (FIP) or In Transition to MSC (ITM). Where this is not available, we will work with suppliers closely to ensure best practice and management of species. We will also support suppliers to work on developing standards, as appropriate, such as engagement with Community Catch Standard Beta Trails to enable the development of the standard for GSSI approval.

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, which follows the guidelines of the SSC Risk Assessment, identifying all relevant risks and will only source from 'low risk' or 'low impact' sources, and from suppliers who meet both our human and animal welfare requirements.

Where we identify an area for improvement via any of the risk assessments, sourcing may be permitted on the basis that a suitable improvement plan is agreed with ASL, depending on the level of risk and collaborative discussions between ASL and the supplier to agree a timebound 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). Any supplier aware of significant changes affecting its compliance with ASL policy requirements should advise their direct contact to support collaborative review of changes.

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

ASL will only approve the supply of lobster and crab from suppliers who either utilise Electrical Stunning or High-Pressure Processing (HPP) prior to further processing and only purchase product caught using pot/creel.

We will work with our suppliers and the wider industry where possible to encourage and support the development and trial of alternatives to crab claw nicking. This is a current practice used by some vivier vessels to prevent live crab from harming each other during storage and transportation. Where possible we will minimise procurement from vessels which have a requirement to live claw-nick crabs.

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. Furthermore, we do not purchase farmed prawns that have been subjected to eyestalk ablation.

We work closely with strategic supply partners to source our Langoustines (*Nephrops Norvegicus*), these are all caught by bottom otter trawl. All suppliers of langoustines to ASL will be asked to provide detailed information relating to the Vessel, Crew, Recruitment Agencies (where applicable), Catch Areas and Techniques.

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 a third party Standard. .Will not contain any mammalian or avian by-products. All suppliers must adhere to applicable legislation and regulations around feed production.

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

All Scottish salmon processed by ASL comes from fully RSPCA assured farms.



Animal Welfare: -

As a major seafood provider, we recognise that we have a 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 of the seafood that we source, including decapod crustaceans.

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 chain and wider industry.

Transportation, Handling and Storage: -

Suppliers are encouraged to adopt best practices, which will reduce stress to the animal and to maximise the survival during transportation throughout the supply chain, until point of despatch. All supply partners must meet relevant legislation in this area for the capture handling and storage of the species they are handling.

All species must be kept in conditions that ensure their welfare, including appropriate light, water quality and salinity, and temperature. Optimal conditions must be maintained throughout the supply chain process, encompassing catching, storage, and transport. Transport methods should be suitable for the specific species, and any period of live storage should be kept as short as possible.

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 suitable welfare standards for all farmed and wild-caught seafood. These Codes of Practice are set to be launched in Summer of 2024. We will encourage suppliers to work with these following their launch.

We work closely with our suppliers and the industry to support the development and implementation of effective and humane stunning and slaughtering processes for all the species we procure and handle. As

technology in this area continues to evolve, we are committed to promoting the adoption of proven best practices to enhance animal welfare standards.

ASL is an active partner in a coalition of experts from across the UK, Ireland, and Norway who are collaborating on a pioneering project to develop an onboard Nephrops Norvegicus stunning and tailing machine. The ability to stun and tail Nephrops at sea could have significant benefits for the fishery including the welfare of Nephrops landed, as well as crew welfare for those working in this field. The coalition is now confident of proof of concept and are now working together to produce a prototype stunning and tailing machine, which will be tested on a UK fishing vessel. Where appropriate we will seek supplier support and engagement in developing best practice in this key area.

ASL does not procure or sell any live Crustaceans.

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 seafood industry, covering a variety of key aspects and would always encourage suppliers to do likewise where possible (some examples provided below where ASL is currently engaged). We have seen the benefits of collaboration and transparent engagement to make positive changes and improvements and we value this approach with stakeholders. ASL has and will support industry through investment in research and development in our shared supply chains, working with suppliers to continually improve knowledge, research and capacity and capability development, and ask suppliers to engage with us on any areas we can potentially support.

We joined the Sustainable Seafood Coalition (SSC) in 2020 to collaborate with other businesses and show best practice by implementing their Codes of Conduct on Sourcing and Labelling. ASL is an active member in both the Steering Group and the Codes Accountability Working Group of the SSC and we refer to the SSC's Codes of Conduct, including The Sourcing Code in our sourcing considerations.

We have been active members of the Steering Group of the Project UK Fishery Improvement Project (FIP) for Nephrops Norvegicus (Langoustine). Working alongside a range of interested stakeholders such as retailers, NGO's, processors, fishing organisations and scientists to guide the fishery towards a level consistent with MSC certification. The UK Nephrops Fishery is now in transition to the ITM program as the current FIP comes to an end in the Summer of 2024. ASL is an active Steering Group and Working Group members of the new ITM program.

The aim of the new ITM project is to:

- A.)** Support UK Nephrops fisheries in working towards meeting the MSC Fisheries Standard.
- B.)** Provide a suitable framework for a structured approach to fishery improvements over time, and;
- C.)** Enable seafood businesses to collaborate in a pre-competitive space and demonstrate a credible process of fishery development.

ASL are also active members of The North Atlantic Pelagic Advocacy (NAPA). There are two Fishery Improvement Projects (FIPs) under NAPA: the North East Atlantic Mackerel and Atlanto-Scandian Herring (ASH) FIP, and the North East Atlantic Blue Whiting FIP. Our primary involvement is with the Mackerel and ASH FIP, which has been active since April 2021 and continues to advocate for better management of these fisheries. NAPA serves as the unified voice of the marketplace for sustainable seafood. The FIPs aim to encourage Coastal States to collaborate and implement science-based, robust fisheries management strategies.

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, accountability, traceability, labour rights, animal welfare, and environmental sustainability through stakeholder engagement and information sharing.

ASL are active members of the Shellfish Association of Great Britain (SAGB) as well as the Association of Scottish Shellfish Growers (ASSG) and work with our industry partners to support best practice and continuous improvement in our supply chains. At the SAGB 2024 conference, we delivered a presentation on crustacean welfare and discussed our ongoing project that explores automation trials for stunning and tailing in the Nephrops industry.

We attended the inaugural Catch Welfare Platform in 2023 and have become active members of the both the Demersal Expert and the Pelagic Expert Groups. These Groups meet quarterly to share knowledge and learnings as well as discuss project opportunities in the sector.

The Catch Welfare Platform is a joint industry/science driven initiative to expedite the transition towards better catch welfare. By bringing scientists, manufacturers, fisheries and their suppliers together, we aim to create pragmatic solutions to improve catch welfare for wild caught species.



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 IPAS1550 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, we are a Partner of 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/>

**stronger
together**

Responsible recruitment | Fair work | Free from exploitation

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 (SEAA). The 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.

ASL was a leading applicant, and match funder along with other industry stakeholders, in 2024 for a SEAA Change on the Water funding application that enabled Scottish White Fish Producer Association a grant to aid the development of their Crew Welfare App. The mobile app is used to help address welfare issues for both foreign and local crew. The collective funding will support the design, trial and launch of the App, which will be used to support Crew Services in the engagement and delivery of improved, secure and private communications between, and to fishers (including foreign fishers), as well as to other relevant stakeholders. A critical feature of the app is to provide crew with advice and guidance on what their rights are and where to report grievances, should anything untoward happen on board. We continue to work with SWFPA on further development and roll out of the App wider than SWFPA Crew Services so this can support more fishers in the UK.

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 "ACTION ALLIANCE" in a larger, bold, blue, sans-serif font.

Fishing Gear Impacts: -

ASL are committed to working with suppliers to reduce unwanted bycatch in all fisheries we source from. 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.

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.