

Sustainability Policy

Kingfisher Foods is a leading UK-based value-added supplier of ambient foods. Since our founding in 1979, we have fostered close relationships with our suppliers and customers. We have traditionally been on the cutting edge of sustainability, supplying the UK's first MSC canned tuna (albacore), first MSC skipjack tuna (Maldivian), and first FAD-free canned tuna to a major supermarket, and with a large percentage of our tuna purchased from pole and line fisheries. Over 50% of our sales are in canned tuna.

Because of the strong relationships we maintain with our suppliers, we are in a position to influence positive change in our source fisheries, crops, and farms. Below are the base standards we will always ensure our products meet. Please note that each of our customers upholds their own strict sourcing criteria which means our products will often go above and beyond this baseline.

1.0. All Products

1.1 No Forced or Underage Labour:

Kingfisher Foods is strictly against forced labour and we clearly communicate this policy to our suppliers. At processing facilities, we use <u>SEDEX</u> Membership to ensure our suppliers provide a safe and healthy working environment for their employees. At sea, we require regular checks of crew lists and vessel conditions upon landing, and are currently investigating auditable standards for ensuring ethical and responsible practices on board, such as the <u>Seafish Responsible Fishing Scheme</u>. For more on our ethical practices, please see our Modern Slavery Act Statement, posted on our website and reviewed annually.

1.2 Legal Compliance:

All products we purchase must be legally compliant and all processors we source from must be aware of the laws and regulations that apply to them on a local, national, and international level. Compliance is verified through Sedex Members' Ethical Trade Audits (SMETAs), carried out on a risk-related basis. Where suppliers are found to be non-compliant, but show a proactive attitude towards improvement, Kingfisher Foods will work with the supplier towards improving standards and worker welfare.

1.3 Endangered Species:

We will not source any species listed as Vulnerable, Endangered, or Critically Endangered on the IUCN Red List (an internationally recognised database that ranks the population health of species – see http://www.iucnredlist.org/).

If a species is listed as Near Threatened, we will purchase from a certified sustainable source wherever possible. In the exceptional circumstance that this is not possible, we will examine the species' regional stock status and/or local conservation status and preferentially source from regions where steps are being taken towards improvement.

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2.0 All Seafood Products

2.1 Overfished Species:

If a fish stock is ranked by its corresponding management organisation as 'overfished', 'undergoing overfishing', or with insufficient data to rank the stock, we will purchase from a healthier stock wherever possible. When this is not possible, we will preferentially source from lower-impact fishing methods, certified sustainable fisheries, or fisheries participating in time-bound Fishery Improvement Projects (FIPs). When none of these options are available, we will investigate and initiate FIPs, as in the case of the Peruvian Anchovy. This is in line with our commitments to the Sustainable Seafood Coalition (SSC).

2.2 No Illegal, Unreported or Unregulated (IUU) Fish:

Fishing must be legal, properly documented, and adequately reported to the relevant authorities in order for monitoring (and thus fisheries management) to be successful.

Kingfisher Foods will not purchase from any fishing vessels engaging in IUU fishing. We clearly communicate this requirement to our suppliers and ensure compliance by double-checking vessel lists and catch certificates against international IUU black lists.

2.3 Supporting Marine Protected Areas:

'Marine protected areas (MPAs) are defined areas that are off limits to fishing and other human uses, and are considered to offer the most comprehensive protection to coastal and near shore ecosystems. MPAs can include limited time and area closures as well as conservation-oriented marine reserves.' (Restrepo, 2012) As a company trading mainly in seafood, Kingfisher Foods has a vested interest in the long-term health of the seas. MPAs provide critical sanctuaries for marine biodiversity, and as such, we supports these areas and will not purchase any seafood caught within the temporal or geographical boundaries of any MPAs where the regulations prohibit fishing of the target species.

2.4 Full Traceability:

All of our seafood products are traceable from their can code back to the vessel(s), area of fishing, species, date, and fishing gear. Our suppliers provide us with full documentation which allows us to complete traceability exercises within a 24-hour maximum, usually within 3 hours. We conduct regular internal traceability exercises to ensure we are meeting this goal.

3.0 Tuna Products

3.1 No Shark Finning:

Shark fins are a Chinese delicacy considered to have medicinal properties. They are one of the most expensive fish products in the world.

'Shark finning is the practice of retaining shark fins and discarding the remaining carcass while at sea.' This practice violates the FAO Code of Conduct for Responsible Fisheries; further, discarding the carcasses leads to a lack of data on the health of shark populations.

Kingfisher Foods will only source from vessel owners with a published policy prohibiting shark finning and requiring sharks be landed with fins naturally attached if retained, displayed on their vessels. We will preferentially source from vessels and vessel owners who have never participated in shark finning and/or do not land all sharks with fins naturally attached if retained. In the exceptional case where this is not possible,

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we will only purchase from vessels at least 2 years following the date of their most recent finding. This is in line with our commitments as an ISSF Participating Company.

3.2 No Transhipment at Sea:

Fishing vessels will often move their catch onto a carrier vessel so that tuna can make its way to a processing facility. When this is done at port, the local authorities can monitor and collect data on the catch to ultimately ensure overfishing is not occurring and fish has been legally caught. However, when fish are transferred at sea, there is a higher likelihood of data not being properly collected. Because of this lack of oversight, transhipment at sea is commonly linked to IUU fishing. For this reason, Kingfisher Foods will not source from any purse seine vessels who have transhipped at sea, *unless* the transhipment has been authorised by all the relevant authorities, the entire process has been overseen by an independent observer, and the catch has been sampled for data collection. This is in line with our commitments as an ISSF Participating Company.

3.3 Dolphin Safe:

We will only purchase from tuna suppliers who are registered under the <u>Earth Island Institute's Dolphin Safe</u> scheme. This ensures that no dolphins or other marine mammals were encircled by a fishing net, that no accidental deaths or serious injuries of any dolphins occurred, and that no drift gill nets were used during a fishing trip.

3.4 Yellowfin Tuna:

As a member of the International Seafood Sustainability Foundation (ISSF), we have committed to reduce annual sourcing of Indian Ocean yellowfin by 11% calculated with respect to our average annual level of Indian Ocean yellowfin purchases from 2017-2019. In 2019, Kingfisher Foods stopped sourcing Indian Ocean yellowfin, meeting ISSF yellowfin reduction targets.

3.5 No Large-Scale Pelagic Driftnets:

We will not source tuna caught by large-scale pelagic driftnets. This is a destructive method of fishing with high levels of bycatch. This is in accordance with the United Nations General Assembly resolution 46/215 calling for a global moratorium on large-scale pelagic driftnets.

(http://earthtrust.org/archive/dnpaper/intllaw.html)

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