

All of our contracts with suppliers include a pledge to respect the Bolton Alimentari policies outlined below.

These policies are illustrated to our clients and can be available to the general public.

All of our personnel shall be informed of these policies and trained in order to implement them.

We are committed to carrying out annual audits on our suppliers to verify that our policies are being observed.

QUALITY

A Matter of Responsibility



2011-2013

Our Principles, Our Commitment

TUNA FISHING AND SAFEGUARDING THE ECOSYSTEM A Sustainable Commitment

OUR PRINCIPLES

Our principles are inspired by the code of conduct for responsible fishing issued by the FAO (UN food and agriculture organisation).

1. Acknowledgment of the nutritional, economic, social, environmental and cultural importance of fishing, taking into consideration the interests of all stakeholders;

2. Finding a balance between biological resources and fishing while avoiding the overexploitation of resources and ensuring their natural capacity for renewal in harmony with the marine ecosystem;

3. The development and encouragement of fishing gear and methods that respect the environment and enable a decrease in by-catch, the fishing of juvenile tunas and other marine creatures;

4. The establishment of data collection systems and the verification and traceability of fishing along the entire supply chain are fundamental to ensuring the sustainability of fishing resources, as is the availability of complete information based on scientific studies;

5. Protected marine areas represent a habitat fundamental to ensuring the conservation, maintenance and protection of biodiversity and favouring the sustainable management of natural resources;

6. The use of fishing resources must place priority on the condition of stocks and ensure there is no risk of extinction or excessive exploitation;

7. We believe it is necessary to pursue a policy aimed at the diversification of procurement by sourcing from different oceans and different tuna species and using different fishing methods with the goal of respecting stock sustainability and balancing the strengths and weaknesses of various fishing methods.



OUR COMMITMENT

Bolton Alimentari has drawn up a series of commitments for the period 2011-2013:

Improving traceability and stopping illegal fishing (IUU)

· We oppose illegal fishing and do not purchase from companies that have any vessel on the IUU, Illegal, Unreported and Unregulated list of the European Union;

· We oppose transshipment at sea that compromises product traceability and consequential food safety for consumers and we do not use tuna that has been transhipped at sea.

Supporting Marine Reserves

· We do not purchase tuna that comes from Marine Reserves or protected areas identified by the Coastal States and the RFMOs (Regional Fisheries Management Organizations);

· We do not purchase tuna from the four marine reserves in the Western and Central Pacific, as established by the Nauru Agreement (PNA) in 2010.

Improving product information

· From 2011 we will specify the tuna species used in our products (by scientific name);

· Wherever technically possible we will also begin specifying the ocean name and fishing method on packaging;

· The company websites (e.g. www.riomare.com) include all information on the traceability of every single product. This can be accessed using the production code displayed on the can.

Reducing bycatch

· We support the scientific research performed by the ISSF aimed at improving tuna stocks and limiting bycatch and the capture of juvenile tunas;

· We are in favour of measures aimed at reducing waste, discharge and the abandonment of fishing gear at sea;

· We continue our commitment, begun in 1992, to the Dolphin Safe programme and support the protection of marine mammals;

· We oppose the use of drift net fishing and do not buy fish caught using this method;

· We do not use tuna caught with a longline;

· We oppose the practice of shark finning and ask for guarantees from our suppliers that they do not practice this activity.

Promoting and adopting sustainable practices

· Our purchasing policy adheres to that indicated by the ISSF, International Seafood Sustainability Foundation, of which we are cofounders and active members. We share their scientific and global approach, complying with information in the most recent stock mapping (www.iss-foundation.org) and their resolutions;

· We are in favour of limiting fishing capacity in proportion to the sustainability of marine resources over the long term and the wellness of the entire marine ecosystem;

· We are in favour of the creation of a single global list of vessels based on the UVI (Unique Vessel Identification) number issued by the IMO (International Marine Organization); and from June 2011, we will only buy tuna from vessels that have such a number;

· Through the ISSF, we encourage the RFMOs - Regional Fisheries Management Organizations - to operate effectively and we support all of their measures to safeguard tuna stocks and the marine ecosystem;

· We work to ensure the acceptance and growing presence of independent international observers on boats during all fishing phases to prevent any kind of irregular practice from taking place;

· We do not use nor will we use at-risk species, such as bluefin tuna (*Thunnus thynnus*);

· We pledge, by 2013, to increase the use of tuna caught using sustainable fishing practices, such as Pole&Line, FAD free, and free schools, to 45%.

RESPECT FOR THE ENVIRONMENT A Strategic Commitment

OUR PRINCIPLES

1. To safeguard the integrity of the environment in which we operate;

2. To ensure compliance with environmental and safety laws using continuous rigorous controls;

3. To manage, preserve and, where possible, decrease the use of natural resources;

4. To identify significant environmental factors in our operations and evaluate and control their impact on the environment;

5. To continually improve environmental performance and reduce the production of waste due to operations that can be directly controlled to a minimum, using feasibility and economic sustainability criteria.



OUR COMMITMENT

· We are creating budgets for water and energy consumption with accredited external institutes;

· We are committed to reducing the emission of greenhouse gases at our Cermentate plant, from 5% in 2005 to over 20% by 2015;

· We have begun the ISO 14001 certification process for the Cermentate plant with the goal of proving the reliability of our environmental management system in minimizing environmental impact;

· Beginning in 2011, 100% of the electricity used by the Cermentate plant will be produced from renewable sources;

· We are committed to achieving a 5% reduction in packaging materials, energy, waste and transportation by 2013;

· We are committed to using packaging materials (such as paper and aluminium) produced from recycled raw materials;

· We are committed to maintaining the level of recyclable packaging materials used for our products at 99%;

· We are committed to guaranteeing that at least 95% of the waste generated by the plant is recovered;

· We are committed to continually improving performance indicators for our suppliers aimed at limiting environmental impact.

RESPECT FOR PEOPLE A Social Commitment

OUR PRINCIPLES

1. We believe that people, with their cultures and backgrounds, are the true protagonists of our company;

2. We promote respect for human rights;

3. We oppose the exploitation of child labour;

4. We strive to operate according to a Code of Conduct that we share with our suppliers;

5. We believe that our company should play an important role in developing the social wellbeing of every participant in the supply chain;

6. We believe that our company can contribute to improving social infrastructures and the wellbeing of people in the home countries of our suppliers;

7. We believe in the need to continually improve training for people involved in all parts of the supply chain.

OUR COMMITMENT

· We pledge to ensure that our suppliers concretely apply our Code of Conduct. Compliance with the principles of the Code affects the duration of collaborations with each supplier;

· An internal Committee will annually identify and evaluate the social projects to be completed in the three following areas:

a. Non-European and developing countries, with the goal of improving the conditions for workers and their families;

b. The social and environmental context of Cermentate, our plant location, with the same purpose;

c. The working conditions of the personnel who work at the plant to ensure they are constantly improved.

· As we have done for years, we will continue to donate our products to organisations, NPOs and NGOs;

· Regular training courses are organised to enhance the professional skills of personnel both within the company and its suppliers;

· We began the process of OHSAS 18001 certification (workplace health and safety certification) which will be completed by 2013.

SELECTION OF RAW MATERIALS A Fundamental Commitment

OUR PRINCIPLES

1. We believe that the achievement of product quality is based on the use of natural, high quality ingredients;

2. We believe that ensuring a constant high level of quality requires the complete involvement of our suppliers;

3. We believe we must screen suppliers and perform strict and stringent controls on our most important and critical suppliers;

4. We believe that priority should be given to suppliers that possess quality, environmental and personnel safety certifications.



OUR COMMITMENT

· We pledge to prepare a procurement policy for all raw materials and ingredients used, which suppliers must comply with as well as our technical specifications;

· We pledge to favour the use of raw materials with a low level of waste and a short supply chain

· We pledge to continually develop and improve our annual supplier control plan;

· We pledge to increase the number of suppliers with certifications for quality, environmental, safety and personnel standards.

ANALYSIS AND CONTROLS A Rigorous Commitment

OUR PRINCIPLES

1. We believe that in order to ensure safe and healthy products a high-quality control policy must be developed;

2. We believe that a large number of targeted controls must be performed, not only internally but also by qualified external analysis laboratories and by cross-checking the results obtained;

3. We believe that a quality management IT system certified by external bodies is essential;

4. We believe that quality controls must follow and take into consideration developments in the most advanced technologies.



OUR COMMITMENT

· We pledge to maintain ISO 9001 certification, quality management system, which we have possessed since 1996;

· We pledge to use advanced IT systems (SAP) for managing all documentation on analyses and controls performed;

· We pledge to continue working with highly qualified international certification laboratories;

· We pledge to support every year the organisation of technical/scientific specialisation workshops focused on the principal quality features, with the participation of relevant experts and scientists.

PRODUCT TRACEABILITY A Transparent Commitment

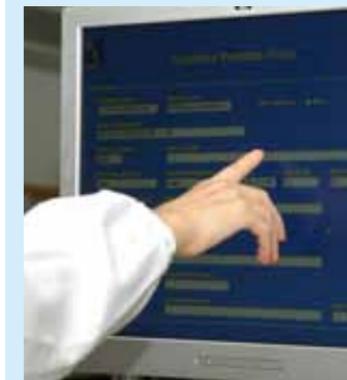
OUR PRINCIPLES

1. We believe that traceability is key to guaranteeing a high level of safety and transparency for consumers;

2. We believe that the traceability of finished products must involve the entire supply chain. The entire story must be revealed – from the sea to the consumer's table;

3. We believe that traceability is essential not only for our products but for our ingredients as well;

4. We believe that effective management of traceability requires the most advanced technology.



OUR COMMITMENT

· We pledge to extend the traceability of tuna to other fishes, vegetables and ingredients;

· We pledge to use advanced IT systems (SAP) to manage the traceability of all ingredients and finished products;

· In a specific section on the company websites (e.g. www.riomare.com) we offer consumers the possibility of requesting information on traceability and asking questions about products, which are answered within 24-48 hours.

NUTRITION AND WELLNESS A Health-Conscious Commitment

OUR PRINCIPLES

1. We believe that a company like our own, which operates responsibly towards Quality, should develop, produce and sell healthy and flavoursome products;

2. We believe that our company, as a food company, should urge and encourage consumers to improve their food and lifestyle choices;

3. We believe that in order to achieve these goals we must develop close partnerships and collaborations with established national institutions so as to identify best practices.



OUR COMMITMENT

· We pledge to maintain a close collaboration with well-known research institutes, accredited nutritionists and doctors and cooking schools, so as to spread and grow a culture of "healthy eating", while drawing inspiration for ways to improve our products;

· We pledge to support our scientific partners (e.g. the Nutrition Foundation of Italy) in developing studies and research on the nutritional benefits of our basic ingredients (e.g. fish, olive oil, etc.) and our products;

· We pledge, through a newsletter, to communicate the nutritional advantages of fish and our products to consumers, and to distribute key information on correct dietary habits and lifestyles;

· We pledge, through our packaging, communication materials and websites to explain the qualities and nutritional benefits of our products;

· We pledge to develop local initiatives aimed at expanding a consumer culture focused on the nutritional properties of fish and our products.