

Sourcing with Integrity

Seafood sourcing

Policy

1. Introduction	3
2. Seafood Sourcing Approach	4
2.1. UN Sustainable Development Goals.....	4
2.2 Pre-competitive working.....	5
2.3 Scope.....	5
2.4 Basic Sourcing Principles.....	6
2.4.1. Traceability.....	6
2.4.2. Illegal, Unreported, Unregulated (IUU) fishing.....	6
2.4.3. Endangered, Threatened & Protected Species (ETP).....	6
2.4.4. Sourcing Due Diligence.....	7
2.4.5. Fishing methods and practices.....	7
a. Fishing & capture methods.....	7
b. Prohibited practices.....	8
c. Ghost Gear.....	8
d. Live decapods.....	8
2.5 Welfare.....	8
2.5.1. Transport to Slaughter.....	9
2.5.2. Humane Slaughter.....	9
2.5.1. Mutilations.....	10
2.6 Fish feed.....	10
2.6.1. Certification.....	10
2.6.2. Forage Fish Dependency Ratio (FFDR).....	11
2.6.3. Sustainable feed.....	11
2.7 Greenhouse Gas Emissions.....	11
2.8 External Initiatives and resources.....	12
3. Management, Governance and Training	12
Management.....	12
Governance.....	13
Annex 1 - Reporting	14
Annex 2 - Species in scope.....	17

1. Introduction

At Ocado, we aim to reduce our impact on the environment by promoting a food system that protects human livelihoods and works in harmony with nature.

Ocado.com is operated by Ocado Retail Limited (ORL) and is the world's largest dedicated online supermarket, delivering to over 80% of the UK.

Seafood represents an important part of our product portfolio, with customers being offered a wide selection of products from well known brands, the M&S food range and Ocado's Own Range.

We are fully committed to ensuring that the seafood we sell is responsibly sourced and we rely on strong relationships with our suppliers in order to deliver our commitments.

We know that our customers want to buy high quality, affordable seafood and care about where the seafood they eat comes from.

The Ocado Seafood Sourcing Policy is fully integrated within the Sourcing with Integrity pillar of the Ocado Sustainability Strategy.

2. Seafood Sourcing Approach

2.1. UN Sustainable Development Goals

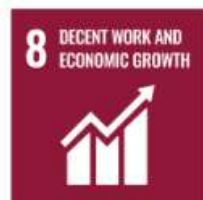
The Ocado Seafood Sourcing Policy adheres to the applicable Sustainable Development Goals.



SDG 13 Climate Action recognises that the world must transform its energy, industry, transport, food, agriculture and forestry systems to ensure that we can limit global temperature rise to below 1.5°C.



SDG 14 Life Below Water aims to conserve and sustainably use the oceans, seas and marine resources for sustainable development. Our sourcing strategy is focused on sourcing fish and seafood from certified sustainable sources.



SDG 8 Decent Work and Economic Growth aims to protect labour rights and promotes decent work for all. We are committed to ensuring that workers in our supply chains, including fishing, are treated with respect and benefit from safe working conditions. Our Human Rights Strategy supports the United Nations Universal Declaration of Human Rights and the International Labour Organization (ILO) Core Conventions.



SDG 17 Partnership for the Goals recognises that multi-stakeholder partnerships that mobilise and share knowledge, expertise, technology and financial resources are needed in order to support the achievement of the Sustainable Development Goals. We are committed to

working in partnership with colleagues, suppliers and NGOs to progress our commitments.

2.2 Pre-competitive working

At Ocado we embrace our responsibilities as actors in the seafood supply chain and are committed to influencing and driving improvements in those areas where we have direct engagement.

However, we also recognise that multiple issues that the seafood industry is facing are global and systemic. When faced with these, we commit to being part of pre-competitive collaborations aimed at driving solutions.

For example, we are members of the Sustainable Seafood Coalition (SSC) and the SEA Alliance and support ad hoc or long term projects aimed at improving the sustainability of seafood sourcing and eliminating modern slavery in seafood supply chains.

2.3 Scope

The scope of the Seafood Sourcing Policy covers all chilled, frozen and ambient wild-caught, farmed fish and shellfish products sold as food for human consumption within the Ocado Own Range (Annex 2). Fish used as an ingredient in ready meals, pates, spreads or pizza are also within the scope of the Policy.

Products not currently in scope are: dietary supplements e.g. Omega 3 fish oil, pet food.

2.4 Basic Sourcing Principles

2.4.1. Traceability

We will only sell fish and shellfish products that are traceable back to a vessel / group of vessels (wild-caught) or pens/ponds (aquaculture).

We encourage and will support our suppliers in implementing electronic traceability systems aligned with the Global Dialogue of Seafood Traceability (GDST).

2.4.2. Illegal, Unreported, Unregulated (IUU) fishing

We will not sell any seafood involved in or linked to IUU.

2.4.3. Endangered, Threatened & Protected Species (ETP)

- a. We will not sell any species included on the International Union for Conservation of Nature's (IUCN) Red List of Endangered Species.
- b. We will not buy any seafood from suppliers who are also engaged in commercial whaling or the processing of whale products.
- c. If Ocado suppliers are sourcing from a fishery where sharks are caught as non-target species, we ask that processes are in place to ensure they are landed with their fins attached.

2.4.4. Sourcing Due Diligence

- a. All wild-caught fish is certified against a GSSI (Global Sustainable Seafood Initiative) benchmarked standard, including the MSC (Marine Stewardship Council), or engaged in a FIP (Fishery Improvement Project) that is credible (working to a process that has measurable indicators and strong partners, is transparent and time bound).
- b. All farmed finfish is certified against a GSSI benchmarked standard, including the ASC (Aquaculture Stewardship Council).
- c. All farmed shrimp is ASC certified.
- d. All species that do not fall under one of the above will be assessed based on the best available scientific advice e.g. ICES and the Sustainable Seafood Coalition (SSC) Codes of Conduct.

2.4.5. Fishing methods and practices

a. Fishing & capture methods

All fishing methods that are legally approved and have been subjected to a robust risk assessment are acceptable.

A risk assessment must consider the impact of the fishery, including the fishing method, on the wider ecosystem e.g. endangered, threatened and protected (ETP) species, seabed impacts. Risk assessments carried out as part of a certification system will be relied upon when a fishing method is proposed.

We are committed to reducing the negative impact of capture methods on the welfare of fish, cephalopod molluscs and

decapod crustaceans and encourage our suppliers to adapt equipment, fishing and handling practices that reduce negative impacts on animals during and immediately following capture.

We are committed to reducing bycatch associated with fishing. We work with our suppliers to implement technological advancements aimed at ensuring bycatch reduction.

b. Prohibited practices

We will not sell fish that has been caught by the use of dynamite or cyanide.

Currently, we will not sell fish that has been caught by pulse trawling.

c. Ghost Gear

We ask our suppliers to adhere to the principles of the Global Ghost Gear Initiative (GGGI).

d. Live decapods

We will not sell any live decapods such as crabs, lobsters, prawns.

2.5 Welfare

At Ocado, we recognise that all fish, cephalopod molluscs and decapod crustaceans are sentient and as such, have the capacity to feel pain and suffer, in alignment with the Animal Welfare (Sentience) Act 2022 and scientific literature. We are committed to their welfare throughout the supply chain.

We work with or are part of initiatives aimed at improving practices during capture, holding, storage, transport and slaughter. We see animal handling and dispatch in wild-capture fisheries as areas where continuous improvement is required.

2.5.1.Transport to Slaughter

It is our aim that all fish, cephalopod molluscs and decapod crustaceans are humanely held and transported when alive. The holding conditions during transport must take into consideration each species' physical, physiological and behavioural needs.

For the species in the ORL supply chains that are transported live, in controlled water systems e.g. Farmed Salmon and Pangasius the shortest and most direct route possible must be followed in order to minimise the duration of transport. Water quality and stocking density must be recorded.

2.5.2.Humane Slaughter

It is our aim that all fish, cephalopod molluscs and decapod crustaceans are humanely stunned and slaughtered. The stunning method used must induce an instantaneous state of unconsciousness and render the fish, mollusc or decapod crustacean insensitive to pain and distress until death occurs.

Where no solutions are available, we expect our suppliers to continuously work on developing these and achieve improvements.

We require suppliers of farmed seafood to implement humane stunning and slaughter methods, including electrical stunning. All farmed shrimp in the OOR supply chains will be electrically stunned by the end of 2025.

2.5.3 Mutilations

We define mutilations as procedures which destroy, remove or irreparably damage the limbs or other body parts of animals.

a. Crustaceans

Eyestalk ablation must be eliminated from the Ocado Own Brand farmed shrimp supply chains by the end of 2025.

We ask Nephrops suppliers to actively work to eliminate live deheading from the Ocado Own Brand supply chains and we will be supporting them in doing so.

b. Finfish

Fin removal can only be carried out when a risk assessment determines that the practice will not cause any pain or suffering to the animal.

2.6 Fish feed

At Ocado, we recognise that farming seafood is resource intensive, as it utilises wild-caught fish to feed farmed fish. The practice contributes to the commercial demand for forage fish, which increases pressure on certain species. However, we recognise the complexity of the feed supply chains and how some forage species cannot be utilised for human consumption.

We will work with our suppliers to achieve the targets set below.

2.6.1. Certification

All fishmeal and fish oil utilised in Ocado Own Brand Aquaculture Supply Chains must be certified to a credible standard such as Marin Trust, MSC/FIPs by 2027 .

Feed should be separately certified to standards including the ASC Feed Standard, the BAP Farm Standard and the Global GAP Feed Standard respectively.

2.6.2. Forage Fish Dependency Ratio (FFDR)

FFDR (FFDR_m and FFDR_o) <1 will be achieved in all Ocado Own Brand Aquaculture Supply Chains by 2030.

2.6.3. Sustainable feed

Ocado are signatories of the UK Soy Manifesto and commit to sourcing 100% verified Deforestation and Conversion Free Soy by 2025.

We will work with industry groups to promote feed innovation around alternatives to ingredients e.g. fish oil used in livestock/fish diets, with a holistic view on the impact feed ingredients have on the environment.

We will focus on using feed materials that have a lower overall impact on the environment or that cannot be fed directly to humans.

2.7 Greenhouse Gas Emissions

We recognise the fact that seafood typically represents a lower carbon source of protein than most land-based animals. However, we also believe that the fishing and aquaculture sectors should strive to lower their carbon emissions and we will work tirelessly with our suppliers to support them in doing so.

2.8 External Initiatives and resources

We encourage our suppliers to make full use of the toolbox made available via:

[Sustainable Seafood Coalition](#)

PAS 1550:2007 “Exercising due diligence in establishing the legal origin of seafood products and marine ingredients - Importing and processing Code of Practice” and its Implementation Guide

Global Dialogue on Seafood Traceability

[Marine Conservation Society](#)

3. Management, Governance and Training

Management

The responsibility for overseeing the implementation of the Seafood Sourcing Policy lies with the Responsible Sourcing Manager, who is competent to oversee the implementation of the Policy.

In case of non-compliance with the Policy, we will work with suppliers to identify the root cause and agree on corrective action that will prevent recurrence.

Governance



Annex 1 - Reporting

Deadline	Measure	Target
Ongoing	<p>2.2 PRE-COMPETITIVE COLLABORATIONS</p> <p>Number of pre-competitive collaborations ORL is part of</p> <p>Objectives of these pre-competitive collaborations and progress</p>	n/a
Ongoing	<p>2.4.1 TRACEABILITY</p> <p>% wild-caught fish traceable to vessel / group of vessels</p> <p>% farmed seafood traceable to pond</p>	100%
Ongoing	<p>2.4.3 ENDANGERED, THREATENED & PROTECTED (ETP) SPECIES</p> <p># ETP species on sale according to the IUCN Red List of Threatened Species</p> <p>% suppliers who declare they are not involved in commercial whaling or the processing of whale products</p>	0 100%
Ongoing	<p>2.4.4 SOURCING DUE DILIGENCE</p> <p>% wild-caught fish certified against a GSSI benchmarked standard (a)</p> <p>% wild-caught fish engaged in a credible FIP (b)</p>	(a)+(b) = 100%

	% farmed finfish certified against a GSSI benchmarked standard % farmed shrimp that is ASC certified	100% 100%
Ongoing	2.4.5 FISHING METHODS AND PRACTICES % fishing methods that are legally approved and have been subjected to a robust risk assessment % fish caught by dynamite or cyanide based on supplying site's declaration # suppliers adhering to the principles of the Global Ghost Initiative (GGGI)	100% 0% n/a
Ongoing	2.5.1. TRANSPORT TO SLAUGHTER Average stocking density during transport per species Water quality parameters during transport	n/a n/a
2026	2.5.2 HUMANE SLAUGHTER % farmed seafood where humane stunning methods are implemented % farmed seafood where electrical stunning methods are implemented % farmed seafood where percussion stunning methods are implemented	100% n/a n/a
2025	2.5.3 EYESTALK ABLATION % farmed shrimp coming from broodstock where no eyestalk ablation is utilised	100%
2027	2.6.1 CERTIFICATION OF FEED USED IN AQUACULTURE	

2030	% of fishmeal and fish oil certified to the Marine Trust or MSC standard or sourced from a FIP	100%
2030	2.6.2 FORAGE FISH DEPENDENCY RATIO (FFDR) FFDRm and FFDRo	<1
Ongoing	2.6.3 SUSTAINABLE FEED % verified Deforestation and Conversion Free Soy # trials aimed at replacing feed ingredients with more sustainable alternatives and/or increase efficiency of production	100%

Annex 2 - Species in scope

Wild-caught Common Name	Wild-caught Scientific Name	Farmed Common Name	Wild-caught Scientific Name
Alaska Pollock	<i>Theragra Chalcogramma</i>	Basa	<i>Pangasius hypophthalmus</i>
Cod	<i>Gadus morhua</i>	King Prawns	<i>Penaeus vannamei</i>
Cold Water Prawns	<i>Pandalus borealis</i>	Salmon	<i>Salmo salar</i>
Haddock	<i>Melanogrammus aeglefinus</i>	Sea Bass	<i>Dicentrarchus labrax</i>
Hake	<i>Merluccius Productus</i>		
Langoustine	<i>Nephrops norvegicus</i>		
Scallops	<i>Zygochlamis patagonica</i>		