

Whitbread Responsible Sourcing Policy Fish and Seafood

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1. Context

Whitbread recognises it has a responsibility to source with integrity and ensure sound social, ethical and environmental practices within its own operations, supply chain and in every market in which it operates. We are committed to ensuring that all our procurement practices are carried out in the most sustainable and responsible way possible and this includes the responsible procurement of all raw materials sourced to produce any product involved in the Whitbread business.

Whitbread recognises the vulnerability of world fish stocks and marine habitats due to an increase in fishing and use of irresponsible and unsustainable fishing methods. Whitbread is committed to working with its suppliers to ensure that all fish and seafood throughout the supply chain is sourced sustainably, using responsible fishing methods that ensure marine ecosystems and healthy population levels of targeted species are protected, safeguarding the feasibility of future fish and seafood supplies. We are also committed to ensuring fair labour standards throughout our fish supply chains wherever they operate.

All Whitbread procurement is subject to compliance with the Whitbread Responsible Sourcing Policy which outlines that 'suppliers may in addition be required to comply with additional sub-policies or standards relevant to the products that we source from that supplier and specific risks or issues associated.' Whitbread considers the procurement of fish and seafood to be an area of such risk and has therefore created this policy document to sit alongside the Responsible Sourcing Policy.

2. Scope

Throughout this document, the term 'fish' refers to any product in the Whitbread supply chain which contains fish or seafood, whether in primal or ingredient form.

3. Policy Requirements

The Whitbread policy ensures that all products and materials within the scope above are sourced in compliance with the following principles:

3.1 Endangered or threatened species

Whitbread will not source any species which are considered to be 'endangered' or 'critically endangered' as outlined in the International Union for Conservation of Nature (IUCN) Red List of Threatened Species.¹

3.2 Fishing management and operation systems

¹ <http://www.iucnredlist.org/>

- Fishing methods will operate in compliance with all applicable local, national and ratified international laws and regulations, including catch-levels and quotas. Suppliers will have the legal right to conduct activities on the area of land, water or coastal environment.
- Fishing vessels will continually seek to adopt ever increasing standards of environmental best practice.
- Fishing operations will ensure that the structure, productivity, function and diversity of the ecosystem are maintained, and local biodiversity of the natural habitat conserved. Any physical or ecological environmental damage shall be kept as minimal as is feasibly possible.
- Fishing operations will not lead to over-fishing or depletion. Where populations are depleted, fisheries will be expected to commit to a management system that promotes recovery in order to secure long-term maximum potential yields.
- As a means of promoting this recovery (and a precautionary mechanism for protecting population levels), fishing methods should be conducted in a way to protect the population's genetic structure, age and sex composition to ensure that reproductive capacity is not damaged.
- Fishing operations will involve methods designed to avoid the capture of non-target specifications (to include species, size, age, sex), to minimise the mortality of this catch where it cannot be avoided and reduce discards of what cannot be released alive.
- No destructive fishing methods such as poisons or explosives shall be used.
- Measures should be taken to ensure that operational waste (eg. Oil spills, on-board spoilage of catch or lost fishing gear) will be minimised.

Farmed Fish

In addition to the criteria above, all fish sourced from fish farms will be subject to the following policy requirements:

- Fish farms will have procedures in place to safeguard against escapes.
- Whitbread expects its suppliers to report all major escapes where they do occur.
- All farmed species (where appropriate) should be farmed to internationally recognised standard see section 4 Certification and Accreditation for Whitbread accepted standards).
- Fish farms should allow for partial inclusion of non-marine feed ingredients for farmed fish. The partial substitution of marine ingredients with non-marine components such as vegetable proteins and oils; algae oils; land animal proteins and other innovative feed solutions will help reduce the dependence on marine resources.

- 3.3 Traditional, civil & human rights and labour standards**
Whitbread will not accept violations of traditional, civil and / or human rights or non-compliance with labour standards as set out in the Responsible Sourcing Policy and in line with the UN Guiding Principles for Business and Human Rights.
- 3.4 Chemical use**
Pesticides and any disease treatments (including antibiotics and parasitcides) will be administered responsibly and be target-focused. The storage, handling and disposal of all hazardous materials and waste will be done responsibly, legally and minimising respective potential environmental impacts.
- 3.5 Water management**
Where fish is sourced from farms, fresh water resource requirements and discharge impact assessment should be conducted to understand the regional ecological impact fishing has. Nutrient levels should also be assessed to ensure local ecosystems are not negatively affected by fishing methods and no contamination occurs.

4 Certification and Accreditation

Whitbread considers the MSC (Marine Stewardship Council) to be the most comprehensive and widely accepted sustainable fish certification system globally for wild-caught fish and therefore is committed to supporting and giving preference to wild-caught fish and seafood certified against the MSC Chain of Custody standard.

However, as the MSC standard covers wild caught fish only and the Whitbread supply chain includes some farmed fish, we are also committed to supporting and giving preference to farmed fish and seafood certified against Internationally recognised standards including ASC (Aquaculture Stewardship Council), GlobalGAP or BAP.

Whitbread will support its suppliers in this commitment and aims to continually increase the amount of certified fish and seafood within the supply chain. Where this is not currently feasible we require our suppliers to refer to the MCS (Marine Conservation Society) 1-5 rating in its Good Fish Guide. Whitbread will not accept any rating above 3.

More information on MSC, ASC , Global GAP and BAP is available on the following links:

<http://www.msc.org/>
<http://www.asc-aqua.org/>
https://www.globalgap.org/uk_en/
<https://www.bapcertification.org/>

In addition, in line with EU legislation, Whitbread will require evidence that all wild fish imported to the EU has a valid catch certificate.

5. Principles of Implementation

As a form of good practice Whitbread keeps a record of all fish suppliers and systematically monitors the performance of all suppliers covered by this policy through direct communication, desk-based certification review and, where relevant, third party verification. We are committed to periodically reviewing this policy to ensure it is up to date, relevant and conducive to driving continuous improvement throughout our supply chain.

In order for suppliers to effectively implement this policy, Whitbread requires them to:

- Communicate this policy throughout their own supply chain.
- Confirm in writing a willingness to comply with this policy.
- Demonstrate traceability and legality of all fish and seafood sources.
- Provide evidence of efforts to ensure that fish and seafood is not procured from controversial or contentious sources.
- Provide documentary evidence confirming certification to the MSC or ASC, GlobalGAP or BAP standard, or where this is not the case, that a credible system working towards achieving full certification is in place.
- Ensure Whitbread representatives, including third party auditors are given uninhibited access to sites used to produce Whitbread goods and that all documentation is accurate and complete.
- Accurately and transparently communicate when these standards are not being met or are unlikely to be met and when support is required to meet these standards.
- Commit to working towards continually increasing the amount of certified fish in its supply chain.
- Ensure transparency of performance against Whitbread's 2020 target to sustainably source critical commodity products and demonstrate a proactive commitment to support Whitbread in achieving its targets through conformance with this policy.

Signed:

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Title:

Date:

I declare that I have received and acknowledge in full Whitbread Plc's Fish Policy and agree to work with Whitbread towards full compliance abiding by the Principles of Implementation.

On behalf of: *(Company name)*

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