Woolworths Group Seafood Sourcing Policy

We create better experiences together

for a better tomorrow

Woolworths Group Limited

ABN 88 000 014 675



Background

Commitment

Woolworths Group is united and driven by our Group purpose: to create better experiences together for a better tomorrow. We strive to have a positive impact on our team, our planet, our customers and the communities we serve – and in doing so create long-term stakeholder value and sustainable growth for our business.

This Seafood Sourcing Policy supports the Woolworths 2025 Sustainability Plan by:

- outlining the minimum sourcing standards of our ecologically responsible seafood; and
- reaffirming our approach to conducting due diligence on forced labour risk.

We will work with suppliers, industry bodies, government, non-government organisations and other stakeholders to deliver our seafood commitments.

Woolworths Group is committed to sourcing seafood responsibly. Ecologically responsible fisheries and aquaculture are critical to reduce the environmental impacts of seafood production, while safeguarding people and animal welfare. Priority must be placed on fishing and farming more responsibly to support fish stocks and marine ecosystems regeneration, to continue to provide for future generations.

This Policy must also be read in conjunction with our Woolworths Group Animal Welfare Policy, which has specific requirements for farmed finfish and shellfish.

People

Woolworths Group is committed to respecting the human rights of workers in its supply chain and notes the detrimental impact that unsustainable seafood sourcing can have on vulnerable communities, including Indigenous peoples and migrant workers, as well as access to safe water and sanitation. We recognise that the most extreme risks to people in the seafood supply chain often occur at lower supply chain tiers, including the vessels, and we will seek to work with our direct suppliers to prioritise our due diligence in these areas.

This Seafood Sourcing Policy must be read in conjunction with the Woolworths Group's Responsible Sourcing Policy and Responsible Sourcing Standards. We expect our suppliers to have the same commitment to safeguarding workers rights, and seek to work with suppliers that can demonstrate this commitment.

Adherence to the Woolworths Responsible Sourcing Policy is a requirement for all suppliers globally for doing business with the Woolworths Group. We expect our suppliers, including suppliers of fresh, longlife and frozen seafood, to understand our Responsible Sourcing Policy and to extend the principles of this Policy, including risk-based due diligence, throughout their supply chain. All direct seafood suppliers of Own Brand and Fresh seafood are in scope of the Responsible Sourcing Standards and are required to complete risk-based due diligence.

Scope

This Woolworths Group Policy applies to Woolworths Supermarkets and Metro Stores in Australia and Woolworths New Zealand. Where specific requirements apply for these businesses, they are detailed separately in this document.

Own Brand - For the purposes of this policy, Own Brand is defined as products:

- where Woolworths Group (or a subsidiary of Woolworths Group) is the IP (Intellectual Property) owner of the brand and/or trademark;
- where Woolworths Group (or a subsidiary of Woolworths Group) is involved in the design and/or development of the product or packaging;
- where Woolworths Group (or a subsidiary of Woolworths Group) has exclusively sourced and has given direction to the product's composition;
- that feature the Woolworths logo (Wcon) or Woolworths New Zealand icons on printed packaging including in-store digi labels.

We aspire that Woolworths Own Brand seafood as an ingredient will be responsibly sourced by 2025. Seafood in pet food, derivatives in cooking products as ingredients or products (e.g. fish sauce, fish stock, extracts and pastes) and extracts in health products (e.g. cod liver oil and krill oil) are not currently included in the scope of this Policy.

This document outlines the seafood sourcing requirements. Seafood refers to all species of fish and shellfish whether wild-caught or farmed, and sourced locally or internationally.

Non Woolworths brands (Vendor Branded) sold by Woolworths Group

Woolworths Group will preferentially source Vendor Branded seafood that meets our Own Brand requirements or is third-party certified against Global Sustainable Seafood Initiative (GSSI) recognised standards. Vendors of Vendor Branded products must comply with the Woolworths Terms of Trade, which stipulate that all relevant laws must be met. Vendors supplying seafood products under their own brands to Woolworths Group must comply with all legislation in regards to seafood in the country it is produced.

Additional

Woolworths Group will conduct internal and external due diligence and investigate incidents, should they arise in our Own Brand supply chain, that have been identified as having environmental or social impacts that are inconsistent with this Policy. This may include:

- Sourcing from vessels that:
- are listed on the combined Illegal, Unregulated or Unreported (IUU) vessel list;
- have been convicted of forced or child labour;
- have been convicted of a serious crime.
- Sourcing species that have been listed as either; Threatened, Critically Endangered, Endangered, Protected, Vulnerable, or Conservation Dependent) on the IUCN red list, or under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).
- Sourcing from aquaculture and fishery operations found by third party certifiers or regulators to be contributing to adverse cumulative impacts on ecosystems.
- Sourcing from fisheries that use destructive fishing gears of dynamite and/or poisons.
- Where a 'zero tolerance' or 'critical' non-conformances is identified in any social compliance audit report, requiring the supplier to demonstrate commitment and a plan to remediate and address root causes to mitigate the risk of future breaches and safeguard worker rights.
- When a human rights concern is raised through sources included (but not limited to) our Supplier Speak Up grievance line, media articles, academic and civil society reports.
- Sourcing from countries identified as high/extreme risk to modern slavery.

Australian Requirements

Woolworths Supermarkets and Metro stores in Australia will source seafood that is third party certified or independently verified as ecologically responsible.

Farmed Seafood

We source Woolworths Own Brand farmed seafood products from aquaculture operations that are third-party certified or independently verified.

Accepted certifications are:

- Aquaculture Stewardship Council (ASC) certified; or
- Best Aquaculture Practices (BAP) Farm Standard certified; or
- GLOBALG.A.P. (GGN) certified.

Where farmed seafood products carry the ASC logo these products are additionally assessed against the ASC Chain of Custody Standard.

The ecological responsibility of mussels and oysters farmed in Australia have undergone an extensive risk assessment by an expert third party and are approved for sourcing as independently verified.

Suppliers must work towards sourcing aquafeed containing soy in line with Woolworth's Group Soy Policy.

Wild-Caught Seafood

We source Woolworths Own Brand wild caught seafood products from fishery operations that are third-party certified or independently verified.

- Marine Stewardship Council (MSC) certified; or
- Independently verified as ecologically responsible:
 - 'Comprehensive' FIPs (listed on fisheryprogress.org) that have a progress rating of A or B
 - World Wide Fund for Nature (WWF) Australia's Ecological Sustainability Evaluation of Seafood (ESES) tool with a classification of low need for improvement¹.
 - Suppliers that are participating companies in the International Seafood Sustainability Foundation (ISSF)²;
 - Via membership of the International Seafood Sustainability Association (ISSA),
 - With no 'major' non-conformances identified in their annual audit report,
 - Only sourcing from vessels listed on the ISSF Proactive Vessel Register (PVR).

Where wild caught seafood products carry the MSC logo these products are additionally assessed against the MSC Chain of Custody Standard.

¹for seafood that is sold, unbranded, behind the counter only.

² for skipjack and yellowfin tuna only. All tuna suppliers are required to collect and maintain relevant traceability information, back to the vessel, for each batch of processed tuna. This information should be available at all times by request.

New Zealand Requirements

Woolworths New Zealand will source seafood which meets all of the below requirements for Own Brand products.

Preferential sourcing of New Zealand seafood that meets the following:

- Supports New Zealand suppliers; and
- Meets New Zealand legislation regulating the sustainable management of fisheries to:
 - recognise the Treaty of Waitangi
 - utilise science-based information
 - o avoid, remedy or mitigate any adverse effects of fishing on the environment,
 - utilise fisheries plans which take an ecosystem-based approach to guide the long-term management of the fisheries.

New Zealand wild-caught seafood must be caught under the Quota Management System and within annual catch entitlements.

We do not source New Zealand whitebait, which is managed outside of the Fisheries Act and Quota Management System by the Department of Conservation and as a recreational fishery.

New Zealand farmed seafood must be harvested under resource consent and from suppliers who are certified to an accepted aquaculture certification scheme (ASC, GGN, BAP) or who are participants in the New Zealand Sustainable Aquaculture A+ programme.

All international seafood sources (except tuna - see below specific 'Skipjack and Yellowfin Tuna' requirements) must meet one of our recognised third-party certifications (MSC, ASC, BAP, GGN).

Skipjack and Yellowfin Tuna is sourced from Suppliers that are participating companies in the International Seafood Sustainability Foundation (ISSF);

- Via membership of the International Seafood Sustainability Association (ISSA);
- With no 'major' non-conformances identified in their annual audit report;
- Only sourcing from vessels listed on the ISSF Proactive Vessel Register (PVR);
- All tuna suppliers are required to collect and maintain relevant traceability information, back to the vessel, for each batch of processed tuna. This information should be available at all times by request.

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