



POLICY ON INGREDIENTS AND RAW MATERIALS

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“The natural resources of the Earth including
the air, water, land, flora and fauna
and especially representative samples of natural ecosystems
must be safeguarded for the benefits
of present and future generations
through careful planning or management”.

Principle no.2

Declaration of the United Nations Conference on the Human Environment (1972)



PREMISE

OUR COMMITMENT TO RESPONSIBLE SOURCING

Responsible sourcing and care for the quality and sustainability of raw materials are essential elements of Bolton Group's sustainable development plan.

In line with the **United Nations Sustainable Development Goals**, the **EU European Green Deal** and the **Ten Principles of the United Nations Global Compact**, Bolton Group is committed to reducing the environmental and social impact of ingredients and raw materials used in its products.

Bolton Group's Policy on **"Ingredients and Raw Materials"** has its roots in the Group's core values and in the commitment on corporate social responsibility and sustainability provided for by the Code of Ethics. Compliance with the principles expressed in this Group Policy allows us to always produce and offer premium consumer goods which are safe for people, while respecting the environment and the communities.

We adopt rigorous quality, safety, circularity and sustainability criteria in the selection of both raw materials and ingredients, which we continuously innovate, thanks to the constant dialogue with our stakeholders, the timely implementation of the reference regulations and the selection of suppliers who respect the same principles.

Based on scientific methodologies and approaches, we evaluate the environmental impact of raw materials and ingredients in our production processes, with the aim of developing increasingly sustainable products.

We also pay maximum attention to the social impacts deriving from the sourcing of raw materials and ingredients, in compliance with the principles set out in the Bolton Group's Human Rights Policy, inspired by the United Nations Guiding Principles on Business and Human Rights.

Our raw materials and ingredients can be divided into the following categories:

- **Raw materials and ingredients of natural origin**, mainly represented by fish, vegetable oils, meat, vegetable ingredients or derivatives, etc.;
- **Raw materials and ingredients of chemical synthesis**, mainly represented by surfactants, oxidants, reducing agents, acids, fillers, polymers, solvents, etc.

They are used for our product categories:

- Food;
- Home and laundry care;
- Personal care;
- Adhesives;
- Cosmetics.

FUNDAMENTAL PRINCIPLES



Business Integrity

Integrity, fairness and transparency are the values that guide us in the procurement of raw materials and ingredients.



Quality

We carefully select raw materials and ingredients to ensure the wellbeing of our consumers and the highest quality standards.



Highest Safety

We constantly use and monitor raw materials and ingredients that guarantee maximum safety both for consumers and in the workplaces.



Materials Circularity

We are committed to promoting a circular approach in materials management, both towards our suppliers and internally for an efficient and sustainable use of resources.



Protection of Biodiversity

We are committed to the conservation of plants and animals biodiversity and we work with suppliers who support these principles.



Animal Welfare

We promote responsible practices for animal welfare in the procurement of raw materials and ingredients, favoring suppliers who go beyond the minimum legal standards.



Responsible Use of Resources

We also evaluate our suppliers on the basis of their ability to mitigate the environmental impacts deriving from their activities, in particular concerning emissions, water consumption and waste.



Continuous Improvement

We constantly work to improve our performance, incorporating innovations that can contribute to the sustainable management of our supplies.



Collaborations and Partnerships

We develop partnerships with relevant stakeholders on national and international scene such as trade associations and sector organizations, universities, NGOs, through specific projects or global initiatives for sustainable sourcing.

SPECIFIC REQUIREMENTS

FOOD APPENDIX

In line with our “Bolton Group’s Policy on Ingredients and Raw Materials”, our Food Business Unit has adopted several policies related to:

- **ingredients of animal origin:** tuna, mackerel and sardines, farmed salmon, mollusks, beef;
- **ingredients of vegetable origin:** oil, vegetables.

In order to spread our commitment towards the suppliers, they are fostered to undertake this virtuous path by submitting these policies.



TUNA SOURCING

Bolton Food (hereafter “BF”) has determined that the **environmental and social respectful management of tuna fisheries is a core aspect of its sustainability commitments and that must require the commitment of its suppliers and business partners** to improve and reinforce the key elements and requirements set forth in this Policy.

BF is committed to have 100% of its tuna MSC certified or coming from comprehensive and credible **Fishery Improvement Projects (CC FIP)**¹ by 2024. For this reason, BF has the aim of increasing its sourcing from **Marine Stewardship Council (MSC)** certified fisheries. In order to source tuna from fisheries not yet certified by MSC, BF shall ensure that CC FIP are in place in those fisheries or that they have entered into MSC full assessment. This commitment to using only MSC certified tuna leads us to **encourage our suppliers to participate in MSC certification initiatives** as the best way to help achieve the fishery environmental sustainability standards advocated by BF.

¹ According to WWF®, we consider a FIP as credible and comprehensive when it is compliant with all the criteria of both definitions:

Comprehensive FIP: A FIP that addresses the full range of environmental challenges considered within the MSC Standard, with the aim of having the fishery perform at the level of an unconditional pass against the MSC standard. A comprehensive FIP needs to conform to the following criteria: a scoping document and MSC pre-assessment has been completed by an independent third-party auditor; an action plan has been established; the FIP has been publicly launched; the FIP has entered its implementation stage, that is stage 3 within FIP guidelines; the fishery is making progress according to the action plan designed to reach a level consistent with the MSC standard within the agreed time frame (max. 5 years); progress is to be evaluated by an external independent consultant periodically for the entire duration of the FIP.

Credible FIP: A FIP whose actions are transparent; complies with a process for clearly showing improvement in fishery performance; and can demonstrate fishery evaluation through a robust, independent assessment process and is rated “A” or “B” in fisheryprogress.org

BF shall preferentially source tuna caught from selective fishing methods with a low level of by-catch and environmental impact (pole and line, hand line, FAD-free purse seine, small-scale purse seine vessels fishing only in the Exclusive Economic Zone (EEZ) of their flag state and participating in a FIP). BF is a proud founding member of the International Seafood Sustainability Foundation (ISSF) since 2009 and as such, both our fishing policy and acquisitions from third parties abide by the conservation measures and recommendations issued by the ISSF.

Furthermore, as leaders in the sector and aware of the challenge of having a 360° sustainability throughout our supply chain, we want to guarantee, through compliance with our corporate codes and policies on social and labor issues, the fulfilment and respect of the Human Rights of the people involved in our supply chain and of the communities in which we are present.



BF asks its suppliers to:

1. Comply with all existing and applicable local and international legislation. In particular, full compliance with the applicable legislation of the country of origin, and that of the European Union² must be considered a mandatory condition.
2. Comply with all applicable RFMO and ISSF conservation measures³.
3. For tuna caught by large-scale purse seiners (hereinafter, "LSPS"), ensure FAD management measures are in place including:
 - a. Not exceeding 300 active (i.e. deployed and activated within 5 miles from the boat only once) drifting FADs per vessel across the fleet and per RFMO area;
 - b. Use only fully non-entangling FADs made primarily with natural materials by 2024.
4. For tuna caught by large-scale purse seiners, ensure that said LSPS are equipped with fully operational Automatic Identification Service (AIS) and Vessel Monitoring System (VMS), as required by flag state and RFMO regulations.
5. Comply with the "Dolphin Safe" program, as defined by the Earth Island Institute.
6. Do not use tuna caught in marine reserves or protected areas identified by and located within the EEZ's of Coastal States that prohibit tuna catch.
7. Do not use tuna caught by longline vessels for BF products unless the fishery is MSC certified or in a comprehensive and credible FIP.
8. Comply with the Code of Ethics and Human Rights Policy of the Bolton Group.
9. Comply with the BF Code of Conduct for Suppliers.
10. Comply with the additional BF Code of Conduct for Tuna Suppliers (vessels) according to the following deadlines:
 - a. All large-scale purse seiners supplying BF by 2022
 - b. All vessels by 2024.

² Compliance with European Union legislation is required for the importation of foodstuffs for raw materials, semi-processed products and finished products that must enter the European Union.

³ <https://issf-foundation.org/whatwe-do/verification/conservation-measures-commitments/>

11. Report all information regarding tuna traceability and transparency, through the Bolton Supplier Workplace Portal when available, including fishing operations (fishing vessel, fishing trip, fishing gear, ocean, FAO area, etc.), transport and unloading (transshipment vessel, port of unloading, dates, etc.) and processing category (round fish, frozen loins or finished products), in sufficient time to obtain BF's approval for shipment.
12. Provide appropriate documentation (i.e. Catch Certificates, Captain Statements, RFMO registers, internal policies, third party audits, etc.) with the dual objective of ensuring full traceability of the products delivered to BF and also to fight against Illegal, Unreported and Unregulated (IUU) fishing.
13. Since BF is committed to have 100% of its tuna MSC certified/CC FIP and because BF believes that achieving the environmental sustainability levels required for MSC certification is the best operational goal we can adopt today, we encourage our suppliers to make public their commitment to support initiatives based on meeting the principles of the MSC certification and engaging in CC FIPs.
14. Collaborate with BF to verify compliance with this policy. BF supports a continuous improvement approach, side by side with our supplier family along the sustainability journey, whereby non-compliance will be addressed with incremental corrective action plans.



Photo credit: Tri Marine



MACKEREL, ANCHOVY AND SARDINE SOURCING

BF has established that the respectful management of the mackerel, anchovy and sardine fisheries is a core aspect of its sustainability commitments and, therefore, that BF must require the commitment of its suppliers and business partners related to the mackerel, anchovy and/or sardine fishing or processing sector in terms of scrupulous compliance with the requirements set forth in this Policy.

BF is committed to increase sourcing from Marine Stewardship Council (MSC) certified fisheries. This commitment to increase the use of MSC certified fish leads us to encourage our suppliers to participate in MSC certification initiatives, such as comprehensive and credible Fishery Improvement Projects (FIPs), in the fisheries in which they operate as the best way to help achieve the fishery sustainability standards advocated by BF.



BF asks its suppliers to:

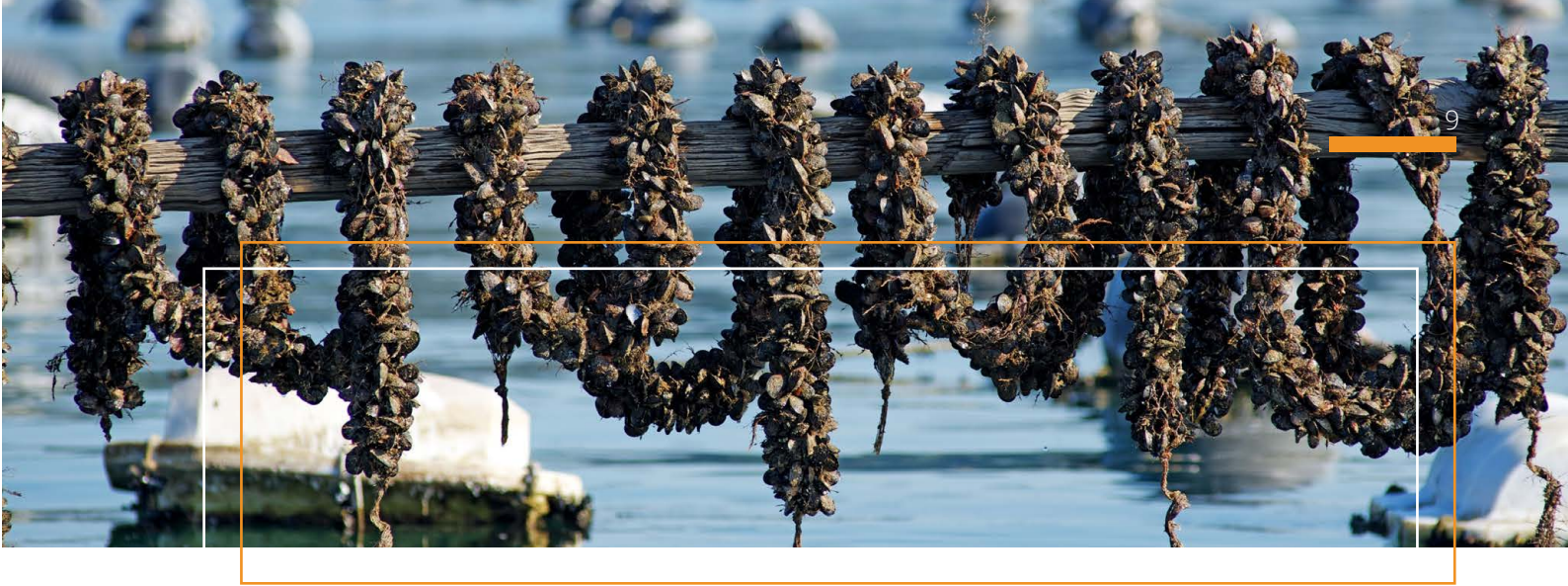
1. Comply with all existing and applicable local and international legislation. In particular, full compliance with the applicable legislation of the country of origin, and that of the European Union⁴ must be considered a mandatory condition.
2. Comply with all applicable RFMO conservation measures and with any other fishing effort limitation measures established by the competent authority in the matter (i.e., quotas, size limits, bans and moratoria) referring to mackerel species *Scomber scombrus*, *Scomber colias* or *Scomber japonicus*, as well as anchovies species *Engraulis encrasicolus* and sardine species *Sardina pilchardus*.
3. Ensure that any fishing vessel suitable for achieving an UVI number (Unique Vessel Identifier) issued by the International Marine Organization (IMO) has done so⁵.
4. Ensure that no vessel that has caught fish intended for supplying BF is listed on the European IUU Vessel List or any other official RFMO IUU list. For trading products, the processor must duly inform BF in case of IUU fish has been processed or used for products with brands belonging to BF.

⁴ Compliance with European Union legislation is required for the importation of foodstuffs for raw materials, semi-processed products and finished products that must enter the European Union. In particular for products entering EU markets, the hygiene rules for food of animal origin, Regulation (EC) No. 853/2004; European Council Regulation No.1005/2008 to prevent, deter and eliminate illegal, unreported and unregulated fishing (IUU Fishing) and Regulation (EEC) No.2136/89 laying down common marketing standards for preserved sardines; and any subsequent regulatory updates.

⁵ IMO Number Scheme – Additional facility for extending the numbering scheme to fishing vessels beyond the scope of resolution A.1078(28): “the management of the identification scheme will endeavour to cover all motorized inboard fishing vessels of less than 100 GT down to a size limit of 12 meters in length overall (LOA), that are authorized to operate outside waters under national jurisdiction”.

5. Ensure that no fish caught in Marine Reserves or other protected areas identified by Coastal States is intended for supplying BF.
6. Ensure that no fish caught using gillnets or driftnets is intended for supplying BF.
7. We encourage our suppliers to promote the above requirements among its own suppliers and/or subcontractors involved in the mackerel/anchovy/sardine production cycle.
8. We encourage our suppliers to make public their commitment to support initiatives based on meeting the principles of the MSC certification and engaging in CC FIPs with the ultimate goal of unconditionally meeting the requirements for MSC certification.
9. Comply with the Code of Ethics and Human Rights Policy of the Bolton Group.
10. Comply with the BF Code of Conduct for Suppliers.
11. Report all information regarding raw material traceability and transparency, through the Bolton Supplier Workplace Portal when available, or through the channels set for in the agreed product specifications.
Maintain total transparency throughout the supply chain including traceability at origin, as well as production operations (extraction, transport, unloading, etc.) and/or processing (semi-processed or end product).
12. Provide appropriate documentation (i.e. Catch Certificates, Captain Statements, RFMO registers, internal policies, third party audits, etc.) with the dual objective of ensuring full traceability of the products delivered to BF and also to fight against IUU fishing.
13. Collaborate with BF to verify compliance with this policy. BF supports a continuous improvement approach whereby non-compliance will be addressed with incremental corrective action plans.





MOLLUSK SOURCING

Aquaculture is crucial to the future supply of seafood, but challenges associated with negative impacts could impede increased production, especially production that is efficient and safe for the environment. Farmed shellfish, if well managed, could be one of the most sustainable forms of food for us to eat, with very low impacts and increasingly recognized benefits to the wider environment. Mollusk harvesting shall be actively managed to promote healthy ecosystems, biodiversity, and production alongside socioecological values.

BF will gradually increase the sustainable and responsible mollusk sourcing and farming according to WWF®'s recommendations and BF's commitments, inspired by the best international standards in the fishing and/or aquaculture industry to improve the sustainability of the resources used by BF.

As a consequence of the above, BF has established that **the respectful management of mollusk harvesting areas and fisheries is a core aspect of its sustainability commitments and, therefore, that BF must require the commitment of its suppliers and business partners** related to the mollusk harvesting, fishing or processing sector in terms of scrupulous compliance with the requirements set forth in this Policy.



BF asks its suppliers to:

1. Comply with all existing and applicable local and international legislation. In particular, full compliance with the applicable legislation of the country of origin, and that of the European Union⁶ must be considered a mandatory condition.
2. Ensure the adoption of good environmental practices and the protection of the ecosystem in the cultivation as well as in the extraction, depuration if necessary, and dispatch of products to BF. BF expects its suppliers to develop their activity minimizing the environmental impact in a way that promotes productivity and quality, while protecting the ecosystem, not admitting bad practices or overexploitation.
3. Promote and apply best practices in mollusk extraction and handling following a system of hazard analysis and critical control points to ensure the quality and safety of raw materials. BF encourages its suppliers to implement food safety and quality management systems that enable them to obtain a GFSI-recognized certification.

6 Compliance with European Union legislation is required for the importation of foodstuffs for raw materials, semi-processed products and finished products that must enter the European Union

4. Promote and collaborate in the application of legal requirements and those adopted in this policy among suppliers and/or subcontractors involved in the mollusk production cycle.
5. The mussels supplied to BF must be of the species *Mytilus galloprovincialis*, cultivated under traditional system of anchored rafts, "bateas", in the Rías Gallegas (Galicia, Spain). BF suppliers must adopt and apply best in class techniques in order to reach an optimum quality in the raw material while respecting the ecosystems in which this mariculture activity is carried out.
6. All mussels farms ("bateas") must be registered as required by current and applicable legislation in the REGA ("Registro General de Explotaciones Ganaderas"), guaranteeing the legality of their activities and compliance with the requirements defined by law and by the competent authorities.
7. Mussels seeds may be harvested from natural mussel larvae (rock) or from collectors (harvesting ropes) with prior authorization from the competent authorities and in such a way that the harvesting of these mussels seeds ("mejilla") does not compromise the integrity of the extraction areas or negatively affect other populations that may occupy these areas, such as barnacles. The seed must be healthy and harvested in accordance with the harvesting periods and the areas set aside for this purpose.
8. Comply with the Code of Ethics and Human Rights Policy of the Bolton Group.
9. Comply with the BF Code of Conduct for Suppliers.
10. Report all information regarding raw material traceability and transparency, through the Bolton Supplier Workplace Portal when available, or through the channels set for in the agreed product specifications. Maintain total transparency throughout the supply chain including traceability at origin, as well as production operations (extraction, "bateas", cookers, transport, unloading, etc.) and/or process (processed product).
11. BF believes that achieving the sustainability levels required for MSC/ASC certification is the best operational goal we can adopt today, we encourage our suppliers to make public their commitment to support initiatives based on meeting the principles of the MSC/ASC certification and engaging in credible projects with the ultimate goal of unconditionally meeting the requirements for MSC/ASC certification.
12. Collaborate with BF to verify compliance with this policy. BF supports a continuous improvement approach whereby non-compliance will be addressed with incremental corrective action plans.



SALMON SOURCING

Aquaculture and marine farming are crucial to the future supply of seafood, but challenges associated with negative impacts could impede increased production, especially production that is efficient and safe for the environment. Farmed fish, if well managed, could be one of the most sustainable forms of food for us to eat, with very low impacts and increasingly recognized benefits to the wider environment. Salmon farming shall be actively managed to promote healthy ecosystems, biodiversity, and production alongside socioecological values.

BF will gradually increase the sustainable and responsible farmed salmon sourcing according to WWF's recommendations and BF's commitments, inspired by the best international standards in the fishing and/or aquaculture industry to improve the sustainability of the resources used by BF.

As a consequence of the above, BF has established that **the respectful management of salmon farms and fisheries is a core aspect of its sustainability commitments and, therefore, that BF must require the commitment of its suppliers and business partners** related to the salmon farming, fishing or processing sector in terms of scrupulous compliance with the requirements set forth in this Policy.



BF asks its suppliers to:

1. Comply with all existing and applicable local and international legislation. In particular, full compliance with the applicable legislation of the country of origin, and that of the European Union⁷ must be considered a mandatory condition.
2. Comply with all applicable RFMO conservation measures and with any other fishing effort limitation measure established by the competent authority in the matter (i.e., quotas, size limits, bans and moratoria) referring to wild pink salmon (*Oncorhynchus gorbuscha*).
3. Ensure that any fishing vessel capable of achieving an UVI number (Unique Vessel Identifier) issued by the International Marine Organization (IMO) has done so.
4. Ensure that no vessel that has caught fish intended for supplying BF is listed on the European IUU Vessel List or any other official RFMO IUU list. For trading products, the processor must duly inform BF in case of IUU fish has been processed or used for products with brands belonging to BF.
5. Ensure that no fish caught in Marine Reserves or other protected areas identified by Coastal States is intended for supplying BF.

7 Compliance with European Union legislation is required for the importation of foodstuffs for raw materials, semi-processed products and finished products that must enter the European Union. In particular for products entering EU markets, the hygiene rules for food of animal origin, Regulation (EC) No. 853/2004; European Council Regulation No.1005/2008 to prevent, deter and eliminate illegal, unreported and unregulated fishing (IUU Fishing) and Regulation (EEC) No.2136/89 laying down common marketing standards for preserved sardines; and any subsequent regulatory updates

6. Ensure that no fish caught using gillnets or driftnets is intended for supplying BF.
7. For farmed salmon (*Salmo salar*) we ask our suppliers to be involved in Robust Aquaculture Improvement Projects and/or ASC certified fisheries. Otherwise, have a proactive role in conserving the natural habitat of the region where the farming operation takes place, through business activities and/or by participating in collaborative initiatives or area management agreements to protect local biodiversity, genetic integrity of wild stock of the ecosystem of the region. This shall include the following topics:
 - Escape prevention management programs to limit the potential impact on nearby wildlife.
 - Responsible management of the introduction of non-native species.
 - Management of the process of genetic improvement via selective breeding, excluding those programs involving the insertion of any foreign genes into the genome of the animal.
 - Have a risk assessment program covering each phases of salmon production cycle.
 - Implement preventive fish health and welfare program to control parasites development, like sea lice, and monitoring of disease.
 - Have programs in place to minimize the use of medicines and antibiotics.
 - Reduce non-biological waste and nutrient release in the environment.
 - Monitoring and recording death rate and implementation of proper disposal methods for dead fish to prevent disease spreading.
 - Exploration of suitable and non-destructive deterrence methods to reduce potentially harmful interactions with marine mammals.
8. Respect all applicable EU legislation concerning the use of hormones and antibiotics.
9. Ensure the implementation of sustainable feed sourcing policy by the supplier committing to:
 - Be able to trace the origin of the salmon feed ingredients.
 - Promote the use of the trimming/by-products of the fish industry for fish oil and fish meal production.
 - Improve feed's composition to increase their sustainability.
 - Monitor the Fish In-Fish Out ratio (or alternative like MNDR), the Feed Conversion Ratio and Marine Index.
10. (For Traders) Exclude from business activities those companies or farmers that have been identified as non-cooperative with one or more of the above-mentioned points or already blacklisted in any official national or regional records.
11. Comply with the Code of Ethics and Human Rights Policy of the Bolton Group.
12. Comply with the BF Code of Conduct for Suppliers.
13. We encourage our suppliers to make public their commitment to support initiatives based on meeting the principles of the MSC/ASC certification and engaging in credible projects with the ultimate goal of unconditionally meeting the requirements for MSC/ASC certification. We also encourage our suppliers to promote the above-mentioned requirements among its suppliers and/or subcontractors involved in the farmed salmon production cycle.
14. Report all information regarding raw material traceability and transparency, through the Bolton Supplier Workplace Portal when available, or through the channels set for in the agreed product specifications. Maintain total transparency throughout the supply chain including traceability at origin, as well as production operations (farming, transport, unloading, etc.) and/or processing (semi-processed or end product).
15. Collaborate with BF to verify compliance with this policy. BF supports a continuous improvement approach whereby non-compliance will be addressed with incremental corrective action plans.

OIL SOURCING

BF considers itself engaged in the careful management of this essential global resource as a key feature of a sustainable future starting by its supplying and sourcing activities.

In the framework of BF's Social Responsibility commitments, all suppliers and producers of BF involved in the oil supply chain, shall get appropriately organized to commit with the measures set forth in this Policy.



BF asks its suppliers to:

1. Comply with all local and international legislation in force and applicable. In particular, full compliance with the applicable legislation of the country of origin, of the country where the final product will be marketed and of the European Union⁸ must be considered as a mandatory condition.
2. Ensure full compliance with both the product specifications agreed with BF and the conditions established in the purchase agreement; with special attention to the requirement of full traceability from the harvest of the olives or the other seeds to the final delivery of the product to BF.
3. Ensure the adoption of practices and technologies to properly manage soil and hydric resources to prevent degradation of land and soil, including land affected by potential desertification.
4. Support the conservation of ecosystems including their biodiversity. In particular, minimize the use of pesticides and/or fertilizers.
5. Ensure the adoption of action plans to reduce the environmental impact of the activity and industrial operations, with particular emphasis to reducing the greenhouse gas emissions, water consumption and overall carbon footprint of the products supplied to BF.
6. For the supply of olive oil and virgin olive oil, the supplier must guarantee the absence of any other type of vegetable oil or other ingredient as set out in the applicable European legislation and in the required product specifications established by BF which are mandatory in their entirety.
7. Ensure that the olive oil is consistent with the specific characteristics applicable to the declared category, based on the classification of International Olive Council (IOC).

⁸ Compliance with European Union legislation is required for the importation of foodstuffs for raw materials, semi-processed products and finished products that must enter the European Union.



8. Comply with the Code of Ethics and Human Rights Policy of the Bolton Group.
9. Comply with the BF Code of Conduct for Suppliers.
10. Report all information regarding oil traceability and transparency, including farming operations and processing operation in the Bolton Supplier Workplace, when available, or through the channels set for in the agreed product specifications.
11. Collaborate with BF to verify compliance with this policy. BF supports a continuous improvement approach whereby non-compliance will be addressed with incremental corrective action plans.

VEGETABLES SOURCING

BF considers itself engaged in the careful management of this essential global resource as a key feature of a sustainable future starting by its supplying and sourcing activities.

In the framework of BF's Social Responsibility commitments, all suppliers and producers of BF involved in the olive oil supply chain, shall get appropriately organized to commit with the measures set forth in this Policy.



BF asks its suppliers to:

1. Comply with all local and international legislation in force and applicable. In particular, full compliance with the applicable legislation of the country of origin, of the country where the final product will be marketed and of the European Union⁹ must be considered as a mandatory condition.
2. Ensure full compliance with both the product specifications agreed with BF and the conditions established in the purchase agreement, with special attention to the requirement of full traceability from the farm to the final delivery to BF.
3. Ensure the adoption of practices and technologies to properly manage soil and hydric resources to prevent degradation of land and soil, including land affected by potential desertification.
4. Support the conservation of ecosystems including their biodiversity. In particular, minimize the use of pesticides and/or fertilizers.
5. Ensure the adoption of action plans to reduce the environmental impact of the activity and industrial operations, with particular emphasis to reducing the greenhouse gas emissions, water consumption and overall carbon footprint of the products supplied to BF.
6. Comply with the Code of Ethics and Human Rights Policy of the Bolton Group.
7. Comply with the BF Code of Conduct for Suppliers.
8. Report all information regarding oil traceability and transparency, including farming operations and processing operation in the Bolton Supplier Workplace, when available, or through the channels set for in the agreed product specifications.
9. Collaborate with BF to verify compliance with this policy. BF supports a continuous improvement approach whereby non-compliance will be addressed with incremental corrective action plans.

9 Compliance with European Union legislation is required for the importation of foodstuffs for raw materials, semi-processed products and finished products that must enter the European Union.



BEEF SOURCING

BF considers itself engaged in the promotion of a responsible cattle management within its supply chain.



BF asks its suppliers to:

1. Implement sustainability principles coming from Global Roundtable for Sustainable Beef.
2. Ensure respect for the principles of animal health and welfare to meet the EU requirements. In particular, the supplier is committed to guarantee:
 - a. respect of animal welfare in all the phases of the supply chain, from farming to slaughtering;
 - b. freedom from fear and stress;
 - c. freedom from hunger and thirst;
 - d. freedom from discomfort;
 - e. freedom from pain and illness;
 - f. freedom to express normal behavior.
3. Ensure that livestock are raised with constant access to food, duly motivating any type of exception.
4. Minimize the use of antibiotics and other veterinary pharmaceutical products, in any case used in accordance with EU requirements and only for medical reasons.
5. Ensure food safety throughout the value chain thanks to the adoption and implementation of documentary evidence and recordings, through the use of Bolton Supplier Workplace Portal.
6. Ensure the adoption of practices and technologies for the correct management of soil, water and animal manure in order to prevent the degradation of resources.
7. Support the conservation of the ecosystem, such as fighting deforestation of protected areas (where applicable).
8. Minimize the waste production in a circular economy perspective.
9. Constantly improve environmental performance by carrying out concrete actions to reduce the environmental impact of its operations, with particular attention to greenhouse gas emissions and water consumption.

10. Promote the protection of land property rights (where applicable), how to pay particular attention to indigenous peoples.
11. Ensure product traceability, including the use of strong and reliable livestock monitoring systems (i.e. georeferenced data).
12. Provide and keep updated a list of the farms from which the animals used for BF productions come.
13. Avoid purchases from cattle breeders investigated for environmental or animal welfare offenses.
14. Respect what is stated in the Bolton Group Code of Ethics and the Bolton Group Human Rights Policy.
15. Collaborate with BF and / or other external stakeholders to ensure compliance with the above commitments, including on-side audit activities.

TUNA SUPPLY APPENDIX

SUSTAINABILITY POLICY*

This policy establishes and maintains standards for environmental sustainability, protecting human rights and promoting social responsibility. The policy is consistent with International Seafood Sustainability Foundation (ISSF) Conservation Measures, the Seafood Task Force (STF) Code of Conduct and Vessel Auditable Standards and applies to both Tuna Supply Business Unit companies (hereafter Tri Marine) and all Tri Marine suppliers. The intention is to provide Tri Marine, its business affiliates, and customers with a high level of confidence that ecosystem impacts are minimized, and strong labor standards are applied in the capture, trade, production, or distribution of its tuna products.

Laws, Regulations, and Traceability

Tri Marine commits to compliance with all applicable laws and regulations and engagement with government agencies to promote effective fisheries management and equal enforcement. It demands its suppliers do the same. Engagement includes direct participation in Regional Fisheries Management Organization (RFMO) processes and working with national governments to conserve natural resources and protect workers' rights.

Tri Marine staff and associates are active members of the Solomon Islands, American Samoa, United States and China delegations to the Western and Central Pacific Fisheries Commission (WCPFC), as well as the United States, Ecuador, Panama and Colombia delegations to the Inter-American Tropical Tuna Commission (IATTC). We closely monitor the activities of the Indian Ocean Tuna Commission (IOTC) and the International Convention for the Conservation of Atlantic Tunas (ICCAT). Tri Marine's RFMO engagement with the WCPFC and IATTC, and monitoring of activities of ICCAT and IOTC, includes collaboration with NGOs i.e. ISSF, World Wildlife Fund (WWF®), Global Ghost Gear Initiative (GGGI), International Pole and Line Foundation, (IPNLF) and The Nature Conservancy (TNC). Importantly, Tri Marine has worked with ISSF, TNC, and other institutions such as the Secretariat of the Pacific Community (SPC) on voluntary research projects to improve our tuna resource management. This includes an emphasis on bycatch mitigation and electronic monitoring (EM).

Tri Marine rigorously collects and reviews traceability documentation from fishing vessel to final sale and uses third party review (see ISSF and MSC below), limiting the risk of illegal, unregulated, and unreported (IUU) seafood entering Tri Marine's supply chains. Traceability starts with longterm relationships with established fishers and includes detailed sourcing data for each shipment of tuna including vessel name, IMO number, license information, fishing area, tonnages by species, trip dates, ports of call and more.

Supporting the ISSF Foundation

Good science and management require a multi-stakeholder approach including industry, government, academic institutions, and NGOs. In 2009, Tri Marine with other industry leaders founded the multi-stakeholder ISSF. ISSF's mission is to undertake and facilitate science-based initiatives for the long-term conservation and sustainable use of global tuna stocks, reducing bycatch and promoting tuna ecosystem health.

Over the last ten years, ISSF has become the foremost organization addressing tuna sustainability and is a pillar of Tri Marine's collaborative environmental efforts. As an ISSF member company, Tri Marine voluntarily adheres to all of the organization's adopted conservation measures: 1) RFMO Support; 2) Traceability & Data; 3) Bycatch Mitigation and Best Practices; 4) Monitoring, Control and Surveillance; 5) Protecting against IUU Fishing; 6) Controlling Capacity; 7) Utilizing the Proactive Vessel Register Vessels.

Achieving Sustainability Certification

Tri Marine encourages the use of environmentally sound and sustainable methods in the catch, processing, transportation and storage of fish and fish products by developing, utilizing, and sharing appropriate policies, technologies, and practices. This includes the application of leading third-party sustainability standards and certifications, namely those of the Marine Stewardship Council (MSC) and Fair-Trade USA. To date, Tri Marine holds the following:

- MSC certification of free school, purse seine caught skipjack and yellowfin by US flagged vessels in the Western and Central Pacific Ocean (WCPO).
- MSC certification for pole and line and purse seine caught skipjack and yellowfin in the Solomon Islands.
- MSC certification for longline caught albacore and yellowfin in the Solomon Islands.
- Fair-Trade USA certification for pole and line and purse seine caught skipjack and yellowfin in the Solomon Islands.

Tri Marine engages in MSC full assessments of additional flag states for its WCPO certification, of its supply of longline caught albacore from the Atlantic Ocean and commits to increasing the volume of its MSC certified supply over time.

Tri Marine has 100% responsibly sourced through MSC, under assessment MSC, FIP A,B,C and fish that meets all RFMO requirements.

Supporting Fisheries Improvement Projects (FIPs)

For fisheries not yet able to achieve MSC or Fair-Trade certification, Tri Marine supports comprehensive FIPs designed to bring fisheries up to a level consistent with internationally recognized sustainability standards. For a FIP to be considered robust, its activities must be comprehensive and credible; it should address the full range of environmental challenges necessary to achieve a high level of sustainability. The process must include multi-stakeholder engagement, an MSC pre-assessment, a publicly available workplan designed to remedy deficiencies identified in the pre-assessment, a budget, designated staff, and public reporting on progress. Guidelines and publicly available information on FIPs can be found at www.fisheryprogress.org. Tri Marine leads or directly engages in FIPs in Indonesia, the Eastern Pacific Ocean, the Atlantic Ocean and sources tuna globally from suppliers actively engaged in FIPs.



DOLPHIN SAFE POLICY

With a view to **eliminate the injury and death of dolphins** as a result of either encirclement by purse -seine nets, the use of drift/gill nets, or incidental bycatch with any gear type, Tri Marine has adopted the following corporate policy:

1. Tri Marine will procure, purchase, and distribute Dolphin Safe Tuna Products. Dolphin Safe is defined as being compliant with the Earth Island Institute's International Monitoring Program (IMP), the European Dolphin Safe Monitoring Organization (EDSMO), and/or the US Dolphin Protection Consumer Information Act.
2. Tri Marine will not knowingly transship, carry, store, or sell tuna products or any other seafood products caught by intentional encirclement of marine mammals in purse seine nets in any of the world's oceans, nor will it transship, carry, sell, or store seafood products harvested in driftnets, and will not engage with any known IUU vessels.
3. Tri Marine stipulates as a condition in all its contracts with processors, brokers, agents, and importers that any tuna shipment found to be in violation of its and/or the EII dolphin-safe standards will be rejected with assessment of cost and damages against the responsible packer/broker/agent/importer/supplier, and a repeat of such shipment will result in termination of business.
4. Tri Marine, including its subsidiaries worldwide¹⁰, does not purchase, import, or sell whale products, shark fins, sea turtle products, or any marine mammal products. Tri Marine also does not engage in dolphin drive fisheries or whaling or any trade in live dolphins.
5. Tri Marine will, when requested by Earth Island Institute, use its best endeavours to facilitate with its customers and suppliers audits by Earth Island Institute of transshipment sites (ports, harbors, etc.), cold storage facilities, transport vehicles (freezer trucks, etc.), canneries, retail outlets, and any other locations and/or documentation deemed necessary by Earth Island Institute for auditing against the EII Dolphin Safe policy.

10 TRI MARINE Management Company LLC, TRI MARINE Europe S.P.A., TRI MARINE International S.A., TRI MARINE International, (PTE) LTD, TRI MARINE International Spain S.A., National Fisheries Development LTD, Soltuna LTD, Seafman CA, Gralco S.A.

HOME & PERSONAL CARE APPENDIX

In line with our “Bolton Group’s Policy on Ingredients and Raw Materials”, we want to provide safe and sustainable products to our consumers, through the development and implementation of specific policies and strategies for chemicals.

Whenever feasible, we seek to substitute synthetic chemicals with sustainably-sourced natural ingredients.

We are inspired by frameworks and guidelines aimed at evaluating and managing health, social and environmental impacts related to our products.

Herewith, we communicate our:

- **Black Listed Materials:** list of raw materials eliminated from our products or raw materials we commit to eliminate¹¹;
- **Responsibly-sourced Materials:** list of raw materials we commit to source in a sustainable way.

¹¹ Except for traces present as impurities.

Black Listed Materials

Removed by our personal care products:

Raw material	Type of product
Benzophenone-3	Skin Care, Toiletries, Sun Care
BHA (Butylhydroxyanisole)	Skin Care, Toiletries, Sun Care
Butylparaben	Skin Care
Carminic Acid (C.I. 75470)	Toiletries
Dibutyl Phthalate (DBP)	Perfume components
Diethyl Phtalate (DEP)	
Diethylhexyl Phthalate (DEHP)	
Formaldehyde	Information no longer available in information systems
Propylparaben ¹²	Skin Care, Toiletries, Sun Care
Tinanium Dioxide	See note ¹³
Triclosan	Toiletries

Removed by our home care products:

Raw material	Type of product
Dibutyl Phthalate (DBP)	Hard surface, Laundry, WC cleaning
Diethylhexyl Phthalate (DEHP)	
Formaldehyde	Information no longer available in information systems
MIT (Methylisothiazolinone)	WC cleaning ¹⁴
Sodium Meta Periodate	Hard surface, Laundry, WC cleaning
TEA (Triethanolamine)	Laundry
Titanium Dioxide	WC cleaning

¹² Removed with exceptions.

¹³ Removed by products that can be inhaled. In the other types of product in which we use this ingredient (Skin Care, Toiletries, Sunscreen), we limit its use within formulations.

¹⁴ Removed with exceptions

We are committed to eliminate or reduce in our personal care products the following ones, by replacing with more sustainable alternatives:

Raw material	Type of product	Deadline
BHT (Butylated Hydroxytoluene)	Skin Care, Toiletries, Sun Care	2025
CIT / MIT (Methylchloroisothiazolinone / Methylisothiazolinone)	Toiletries	2025
EDTA (Ethylenediaminetetraacetic Acid)	Skin Care, Toiletries, Sun Care	2025
Ethylhexyl Methoxycinnamate (Octylmethoxycinnamate)	Skin Care, Sun Care	2025
Ethylparaben	Skin Care, Toiletries, Sun Care	2025 ¹⁵
Formaldehyde releasing	Skin Care, Toiletries, Sunscreen	2025 ¹⁶
Homosalate	Skin Care, Sunscreen	2025 ¹⁷
Methylparaben	Skin Care, Toiletries, Sun Care	2025 ¹⁸
MIT (Methylisothiazolinone)	Toiletries	2025
Octocrylene	Skin Care, Sun Care	2025
SLS (Sodium Lauryl Sulphate)	Toiletries	See note ¹⁹
SLES (Sodium Lauryl Ether Sulphate)	Toiletries	See note ¹⁹
Microplastics	Skin Care, Toiletries, Sun Care	See note ²⁰

¹⁵ Will be removed with exceptions.

¹⁶ Will be removed with some exceptions, in non-significant percentages.

¹⁷ Will be removed with exceptions.

¹⁸ Will be removed with exceptions.

¹⁹ We are committed to reducing the use of SLS and SLES and / or to replacing them with more sustainable alternatives. We constantly monitor the scientific debate relating to these types of materials in order to improve our formulas.

²⁰ We are committed to reducing the use of microplastics, as defined by ECHA, within formulations for aesthetic or accessory purposes and / or to replacing them with more sustainable alternatives. We constantly monitor the scientific debate relating to these types of materials in order to improve our formulas and minimize the environmental impact.

We are committed to eliminate or reduce in our home care products the following ones, by replacing with more sustainable alternatives:

Raw material	Type of product	Deadline
Formaldehyde releasing	Hard surface, Laundry, WC cleaning	2025
Phosphonates / Phosphonic Acids	Hard surface, Laundry, WC cleaning	2025 ²¹
Microplastics	Hard surface, Laundry, WC cleaning	2025 ²²

Responsibly-sourced Materials

We have set limitations to ensure more sustainable sourcing of:

Raw material	Why	Type of product
Mica	We only source mica from suppliers who are certified Responsible Mica Initiative or have established social and environmental standards for their supply.	Skin Care, Oral Care
Nanomaterials	We limit the use of nanomaterials due to poor solubility	Skin Care, Toiletries, Sun Care
Talc	We only source talc from suppliers who: <ul style="list-style-type: none"> • can provide the asbestos-free declaration for the purchased volumes • do not source talc from Afghanistan and Pakistan for conflict minerals issues • are members of EUROTALC association 	Skin Care, Toiletries

We are committed to set limitations and ensure more sustainable sourcing of:

Raw material	Why	Type of product
Palm oil derivatives	We commit to source palm oil derivatives from RSPO certified sources.	Skin Care, Toiletries, Sun Care, Hard surface, Laundry, WC cleaning

²¹ Already removed in some products

²² We are committed to reducing the use of microplastics, as defined by ECHA, within formulations for aesthetic or accessory purposes and / or to replacing them with more sustainable alternatives. We constantly monitor the scientific debate relating to these types of materials in order to improve our formulas and minimize the environmental impact.

COSMETICS APPENDIX

In line with our “Bolton Group’s Policy on Ingredients and Raw Materials”, elimination of health hazards through the development and implementation of risk-reduction policies and strategies for chemicals is a priority for our **Beauty care Business Unit**.

We promote the voluntary use of frameworks and guidelines aimed at evaluating and managing health, social and environmental impacts related to our products.

Herewith, we communicate our:

- **Black Listed Materials:** list of raw materials eliminated from our products or raw materials we commit to eliminate²³;
- **Responsibly-sourced Materials:** list of raw materials we commit to source in a sustainable way.

²³ Except for traces present as impurities

Black Listed Materials

Removed by our products:

Raw material	Type of product
4-Methylbenzylidene Camphor	Sun Care
CIT / MIT (Methylchlorisothiazolinone / Methylisothiazolinone)	Skincare, Toiletries, Sun Care, Make Up
Diethyl Phtalate (DEP)	Sun Care
Ethylparaben ²⁴	Skincare, Toiletries, Sun Care, Make Up
Formaldehyde	Make Up
Methylparaben ²⁵	Skincare, Toiletries, Sun Care, Make Up
MIT (Methylisothiazolinone)	Skincare, Toiletries, Sun Care, Make Up
Ethylhexyl Methoxycinnamate (Octylmethoxycinnamate) ²⁶	Skincare, Sun Care, Make Up
Octocrylene ²⁷	Skin Care, Sun Care, Make Up
Triclosan	Toiletries

²⁴⁻²⁵⁻²⁶⁻²⁷ Removed with exceptions

We are committed to eliminate or reduce the following ones, by replacing with more sustainable alternatives:

Raw material	Type of product	Deadline
Benzophenone-3	Sun Care, Make Up	2025
BHA (Butylhydroxyanisole)	Skincare, Sun Care, Make Up	2025
BHT (Butylated Hydroxytoluene)	Skincare, Toiletries, Sun Care, Make Up	2025
Butyl Methoxydibenzoylmethane	Skincare, Sun Care, Make Up	2025
Butylparaben	Skincare, Toiletries, Sun Care, Make Up	2025
Carminic Acid (C.I. 75470)	Make Up	2025
Cyclopentasiloxane	Skincare, Make Up	2025
Formaldehyde releasing	Skincare, Make Up	2025
Propylparaben	Skincare, Toiletries, Sun Care, Make Up	2025
SLS (Sodium Lauryl Sulphate)	Toiletries	2025
SLES (Sodium Lauryl Ether Sulphate)	Toiletries	2025
Microplastics	Skin Care, Toiletries, Sun Care, Make Up	See note ²⁸
TEA (Triethanolamine) ²⁹	Make Up	2025

²⁸ We are committed to reducing the use of microplastics, as defined by ECHA, within formulations for aesthetic or accessory purposes and to replacing them with more sustainable alternatives. We constantly monitor the scientific debate relating to these types of materials in order to improve our formulas and minimize the environmental impact

²⁹ Will be removed with exceptions.

Responsibly-sourced Materials

We have set limitations to ensure more sustainable sourcing of:

Raw material	Why	Type of product
Heavy Metals	<ul style="list-style-type: none"> Nickel is currently monitored in some references for all production batches Random checks carried out on finished products Outsourcing partners will be required to check the raw material data sheets to minimize the heavy metal content Systematic tests will be carried out on each production batch of cosmetics considered most at risk 	Make Up, Skincare
Mica	We only source mica from Responsible Mica Initiative certified sources	Make Up, Skincare, Toiletries
Nanomaterials	<ul style="list-style-type: none"> We limit their use to where technically unavoidable and only if considered safe By 2025, they will be eliminated in spray products 	Skincare, Sun Care, Make Up
Talc	We only source talc from suppliers who can provide the asbestos-free declaration for the purchased volumes	Skin Care, Toiletries
Paraffin / Petrolates	We limit their use to where technically unavoidable to guarantee product safety and quality	Skincare, Sun Care, Make Up
Pearlescent pigments and agents	We only source from suppliers who have established social standards against child labour for their supply	Make Up, Toiletries

We are committed to set limitations and ensure more sustainable sourcing of:

Raw material	Why	Type of product
Palm oil derivatives	We commit to source palm oil derivatives from RSPO certified sources	Skincare, Toiletries, Make Up

ADHESIVES APPENDIX

We strive, in our **Adhesives Business Unit**, to minimize health and safety risks for consumers and employees, as well as environmental and social risks coming from raw materials and formulations, both in existing products and during our innovation and development process. Our products and technologies are tested to ensure their safety both for our health and the environment.

Consumer's health is a major criteria in our innovation and development process. For this reason, we adopt and enforce a strict approach concerning formulations, where technologically and economically viable:

- No new product development with **potential hazardous formulations**;
- Current potential hazardous formulations to ***be replaced by alternatives*** according to market development and legislation. Available alternatives must be offered to our customers actively.

As to maximize safety at work, concerned potential hazardous raw materials are handled with the highest priority to limit the occupational health risks for our employees, in compliance with the applying laws and regulations.

All our products comply with the latest regulations and are labelled according to it. When used according to the regulations and instructions, our products can be used in a safe way.

We promote the voluntary use of frameworks and guidelines aimed at evaluating and managing health, social and environmental impacts related to our products.

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BOLTON
GROUP

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