



OXFAM AND BOLTON: TOGETHER FOR A HUMAN ECONOMY. FOR FAIR AND SUSTAINABLE FOOD

Partnership report 2020-2024

Oxfam and Bolton are working together for an economic model based on the respect for human rights and more equitable, inclusive supply chains.

This report presents the roadmap and the results of 4 years of work in partnership in the area of human rights, from 2020 to 2024.



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FOREWORD

LUCA ALEMANNO

Chief Executive Officer, Bolton Food



At Bolton, sustainability is a commitment deeply embedded in the way we do business. Across all our activities, we strive to create value responsibly, ensuring that economic growth goes hand in hand with environmental protection and respect for human rights.

Within this vision, the Food Business Unit plays a leading role. As a global player in the seafood industry, we know that our responsibility extends well beyond our operations. It includes the people who work across our supply chains, the communities connected to them, and the ecosystems we rely on. We believe that leadership in this sector means not only improving our own practices, but also helping to drive meaningful change across the entire industry.

In 2020, we took a decisive step by entering into a multi-country, long-term partnership with Oxfam. Our

goal was clear: to strengthen our commitment to human rights, acting in a way that creates lasting impact, not only within our company, but across the sector.

This partnership has been focused on creating a path based on shared values, one that recognizes complexity and fosters meaningful change. Through our collaboration with Oxfam, we have engaged in an open dialogue to address challenging issues and turned them into actionable policies and plans.

We are proud of the progress made, but we are even more aware of the journey ahead. Respecting human rights is not a destination, it is a continuous commitment. It is the foundation of a fair and sustainable seafood industry, and of a *Human Economy* that truly puts people at the center.

Acting to create impact is the responsibility of those who lead. With this partnership, we are doing both: transforming our own practices, and helping to raise the bar for the sector. And we will continue to walk this path with humility, determination, and the deep belief that doing the right thing is not only possible, it is necessary.

FOREWORD

ROBERTO BARBIERI

Executive Director, Oxfam Italy



The social sustainability path taken by Bolton Food is remarkable. For the first time, one of the world's leading producers in the canned tuna industry has established a partnership with Oxfam to better investigate the impacts of its operations on human rights and to further address, mitigate and prevent negative impacts on the lives of its workers and communities throughout its supply chain, in line with the *United Nations Guiding Principles on Business and Human Rights (UNGPs)*.

Such a partnership, which has already lasted over 4 years, implies working together to bring about real change in the company's policies and practices as they relate to human rights issues. This journey has been diving into a very complex environment where human rights may be at risk for workers both at its processing plants and on board fishing vessels.

Oxfam has really appreciated the genuinely open discussions held within the company from the very beginning of the partnership, which benefited from the different perspectives of people in different roles on a range of issues. These discussions have pushed the company to adopt relevant policy changes and multi-year action plans addressing all the top priority recommendations made by Oxfam. This is a tentative step forward, as at the moment the plans include roadmaps that still need to be defined and made operational in the coming years. However, it is commendable that the company has already made bold commitments in the medium term such as, for instance, aiming to reach the appropriate living wage benchmark for low-paid workers, implementing a gender equality and diversity plan and designing and implementing a grievance mechanism at site and group levels.

The hope is also that the journey undertaken by Bolton might inspire other companies in the same industry and beyond. It demonstrates that changing policies and practices to achieve greater social sustainability is feasible, and that it is the best contribution that the industry can make to society.



Bolton is an **Italian family-owned company** that has been producing and distributing a vast range of innovative, sustainable and high-quality branded consumer products, for more than **70 years**. Today, Bolton is an international company with more than **11000 employees**, present in more than **150 countries** with a portfolio of 60 well-known brands that are part of everyday life for millions of consumers.

The Food Business Unit is the largest within Bolton and stands as a global player in the seafood industry.

Thanks to a fully vertically integrated tuna supply chain, of which Tri Marine, one of the world's largest players in tuna supply, is a core component, Bolton Food oversees every stage of the process: from responsible sourcing and fleet management to processing and marketing. Currently it owns 9 processing tuna plants in 6 different countries and 11 fishing vessels. Its products are distributed in more than 60 countries under trusted brands such as Rio Mare, Saupiquet, Isabel, Cuca, and others.

The information in this report refers to activities carried out by Bolton within its Food Business Unit, in the context of its collaboration with Oxfam, including the work done in the following locations:

- Conservas Isabel Ecuatoriana processing plant and four vessels (two Spanish-flagged vessels from Atunera Adularra and two Ecuadorian-flagged vessels from CIESA) in Manta (Ecuador).
- Nouvelle Cosarno processing plant in Agadir (Morocco).
- Gralco processing plant in Barranquilla (Colombia).



Oxfam is a global movement of people and a **global confederation of 22 independent member organizations**, known as affiliates, working together in **77 countries** to **challenge inequality and injustice in partnership with communities**. Each affiliate is rooted in its own context and contributes to Oxfam's shared mission through locally led action and collective decision-making.

Oxfam saves lives when disaster strikes, creates sustainable development activities with local communities, proposes responsible lifestyles, by lobbying in support of fairer rules that combat inequality, and safeguard poorer, more vulnerable individuals, by meeting the requirements of consumers and the environment. Oxfam works to tackle not just the symptoms but the systems of inequality.

In 2023-2024, Oxfam's activities reached **15,3 million people** in **81 countries** working with **2341 local partners**. **53% people were women and girls**, 27% were young people and 5% were disabled people. 12 million people were reached through humanitarian response.

Oxfam began life as a non-profit organization (the Oxford Committee for Famine Relief in Oxford in the UK) in **1942**.

The Oxfam confederation as a whole employs **8279 people**.



OUR PARTNERSHIP VISION

TOGETHER FOR A HUMAN ECONOMY: ADVANCING FAIR AND SUSTAINABLE FOOD

In 2020, Bolton, through its Food Business Unit, and Oxfam entered into a partnership to deepen the understanding and mitigation of salient human rights issues across the company's seafood supply chains.

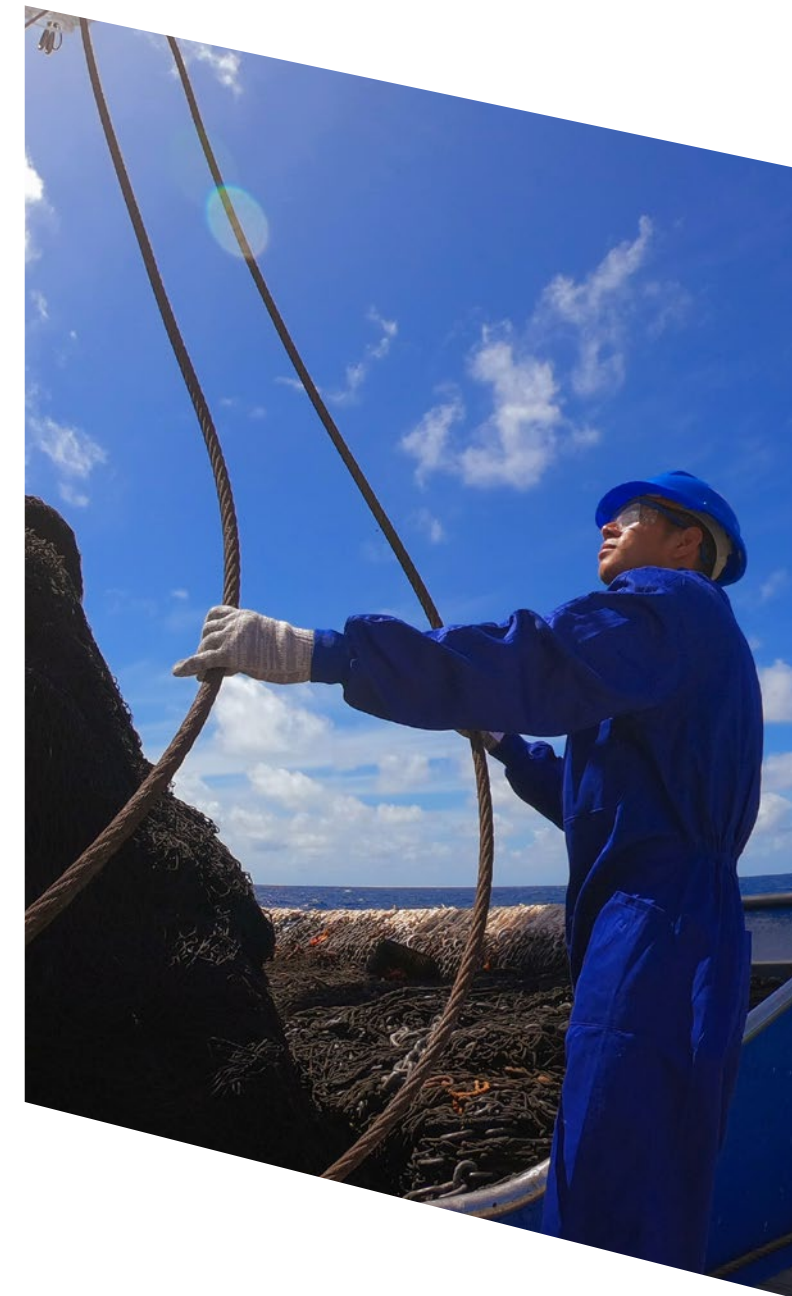
The collaboration also aims to set new benchmarks for corporate social sustainability in fishing operations, with the goal of creating scalable practices for the wider seafood industry globally.

Throughout this four-year partnership, Oxfam and Bolton shared the objective to collaboratively build a more equitable supply chain, one that aligns with the principles of a *human economy* as advocated by Oxfam, ensuring fair treatment for all individuals involved. This commitment supports the development of a more sustainable seafood industry by promoting inclusion, reducing inequality, advancing gender equity, upholding human rights, and ensuring safe and decent working conditions across the entire supply chain.

In this context, Oxfam has supported and advised Bolton in the development and implementation of a robust human and labor rights strategy within its global tuna supply chain. This collaboration fostered an innovative approach to assessing and enhancing corporate policies and practices on human rights, contributing to a more inclusive, responsible, and equitable way of doing business that has enabled the company to take a leading role in the seafood sector.

Bolton shared a strong sense of social purpose, recognizing that economic growth must go hand in hand with respect for people and the planet. Its idea of inclusive and social sustainability encouraged the company to collaborate with important and reputable partners to meet the challenges of environmental impacts and social inequalities.

As a global leader in the tuna industry, Bolton has been working with WWF for the past eight years to promote sustainable fishing and protect ocean health. To complement this environmental commitment, the company entered into a collaboration with Oxfam aimed at strengthening its social responsibility strategy, ensuring that both environmental and social dimensions are addressed. Together, these efforts reflect Bolton's ambition to lead the fishing industry by example.



OXFAM'S WORK WITH BUSINESS

Oxfam works together with the private sector across numerous programmes and thought leadership platforms to tackle global poverty and the inequalities that drive it.

Oxfam believes that business can be part of systemic change for a better world. When businesses operate in a fair and sustainable way, the people they impact can thrive and not just survive.

BUSINESS AS UNUSUAL

Oxfam challenges 'business as usual' together with companies, working in supply chains, in places of power and with employees.

With corporate partners, Oxfam pursues many of the UN Sustainable Development Goals (SDGs), placing workers at the centre of their work to install business practices that respect human rights, and respect businesses' obligations set out in the UN Guiding Principles on Business and Human Rights (UNGPs).

Oxfam's extensive experience in researching and addressing the root causes of poverty with communities and partners around the world enables the organization to advise and support businesses to build fairer and more sustainable supply chains.

Oxfam can help companies understand how their operations affect the people in their value chains and the communities and countries in which they operate which, in turn, plays a role in determining the success of the business itself. The organization is encouraging companies to move beyond reliance on suppliers' social audits for compliance with company codes of conduct, towards robust processes of human rights due diligence which goes beyond compliance to really understand the key issues and challenges for workers in corporate supply chains.

BOLTON'S COMMITMENT TO SUSTAINABILITY

Bolton believes that businesses have a proactive role to play in driving the transition to a human and sustainable economy, one that balances profit generation with the responsibility to protect people and the planet. Its mission is to make a positive impact and create value today to preserve the well-being of the future generations. As a leader in the tuna sector, Bolton Food is committed to becoming the most sustainable tuna company for the world. To achieve this ambition, it works in partnerships with key stakeholders across the value chain, adopting a scientific, transformative, and holistic approach to sustainability.

BOLTON FOOD'S SUSTAINABILITY JOURNEY

Bolton took a first step in its journey towards sustainable development in 2009, by being a founding member of the International Seafood Sustainability Foundation (ISSF), a global multistakeholder organization focused on scientific research for sustainable tuna stocks management. Two years later, the first Bolton Food Corporate Social Responsibility plan was launched, under the name "Responsible Quality", setting specific goals and targets on four different pillars: fishing, production, people and nutrition. Sustainability has been progressively integrated into the company strategy, with the goal of transforming the entire supply chain, from catch to consumer. This change in Bolton Food's strategic direction has become even more concrete and credible thanks to its multiple transformational partnerships with global NGOs, such as WWF and Oxfam. These associations have enabled the company to become a leader in sustainable development and a reference point in the seafood industry. The work carried out within the supply chain and with various stakeholders has led Bolton Food's sustainability strategy to be very focused and close to the most material topics for its business. It develops responsible actions targeted at protecting the environment, at guaranteeing the respect of human, social and labor rights of all people involved in its supply chain, at supporting the communities where it is present, and at caring for its consumers. Thus, the Sustainable Development strategy is currently articulated over six workstreams:



1. Sustainable fishing and healthy oceans

Tuna sustainability is a complex topic that can be addressed only by using a scientific, global, and systematic approach. For this reason, Bolton Food promotes responsible and sustainable fishing through partnerships with key environmental organizations such as the International Seafood Sustainability Foundation (ISSF), WWF and MSC. In 2017, together with WWF, the company established a transformational partnership with long-term public

commitments and objectives such as achieving 100% of its tuna from MSC certified fisheries or Credible and Comprehensive Fishery Improvement Projects (FIPs) by 2024. Today 99.7% of tuna comes from responsible sourcing.



2. Human Rights and Communities

Bolton is committed to building a fully fair and inclusive supply chain, one that guarantees the human, social, and labor rights of all workers involved, while also supporting the well-being of the communities where it operates. In this context, Bolton has marked a significant milestone by becoming the first company in the seafood sector to sign a long-term (2020–2024), multi-country partnership agreement with Oxfam, with the aim of setting new standards for social sustainability across the tuna industry.



3. Sustainable Production

Bolton understands the need to address the environmental impact of its activities and is committed to driving change across its value chain. For this reason, it is committed to minimizing the environmental impacts not only within its processing plants, but also those along the supply chain. It actively engages with suppliers to encourage the adoption of increasingly environmentally responsible production practices. Having committed to SBT (Science Based Targets) initiative, it has the objective of reducing the CO2 emissions of its operations and supply chain, in line with the Paris Agreement goals and with what the latest climate science deems necessary to limit global warming to 1,5°C above pre-industrial levels. In addition, the company is working to reduce its water consumption, further strengthening its commitment to sustainable resource management.



4. Health, Science and Nutrition

Today, a large body of evidence suggests that nutrition plays a pivotal role in decreasing the risks of various diseases, such as cancer, strokes and dementia, therefore contributing in maintaining health and improving quality of life. Bolton deals with seafood, a resource that is invaluable in terms of macro and micronutrients supply, but that is still under-explored for the contribution it could have in a sustainable nutritional model. Therefore, the company is deeply engaged in scientific research and innovation activities, in partnership with prestigious institutions, to examine and promote new know-how on seafood to preserve Health through positive Nutrition.



5. Advocacy, policy and due diligence

Bolton strives to be a leading voice in the seafood industry - not only by improving its own operations, but also by championing transformative advocacy initiatives to influence the sector as a whole. To achieve this, the company collaborates with strategic partners to drive meaningful change in fisheries management, aiming to protect ocean health, preserve marine ecosystems, and support the livelihoods of coastal communities. At the same time, Bolton is also implementing ambitious policies supported by a rigorous due diligence and risk management system.



6. Awareness and Education

Bolton Food works to raise awareness, educate and involve consumers and stakeholders on key sustainability initiatives to influence the industry and build reputation. The aim is to change consumers’ behavior by emphasising reliable communication, prioritising quality over quantity in seafood consumption, and recognising consumers’ pivotal role in this endeavor.



OXFAM AND BOLTON PARTNERSHIP PILLARS AND ACHIEVEMENTS

Bolton is the first company in the world to partner with Oxfam in multiple countries to raise the standards that protect human rights in the global tuna supply chain.

This partnership has enabled Bolton Food to take a systemic approach to assess the actual and potential human rights impacts at the production stage and along the company’s supply chain, identify its root causes and to make recommendations for the attribution and prioritization of actions to address, mitigate and/or remediate identified impacts. Through this process, Bolton Food has improved its social strategy in order to strengthen its policies on human rights, social and labor issues alongside its supply chain.



The partnership had 2 main areas of actions in 2020-2024:

1. HUMAN AND WORKERS RIGHTS POLICIES ASSESSMENT

Deep analysis and evaluation of Bolton’s existing human rights-related commitments and corporate policies in order to improve and align them with the best human rights international standards and creation of new corporate policies and commitments on social issues.

Main achievements:

- ▶ Bolton **Human Rights Policy**, supported and advised by Oxfam.
- ▶ Bolton Food **Code of Conduct for Vessels**, supported and advised by Oxfam.
- ▶ **Bolton Food Due diligence Management System internal procedure**, drafted by Bolton also taking into account Oxfam’s suggestions based on the organization’s vision and principles on the protection of human rights.
- ▶ Bolton **Speak Up Policy**, drafted by Bolton, guided by Oxfam’s suggestions to ensure alignment with its vision and principles for protecting human rights.

2. RISK ASSESSMENT AND SUPPLY CHAIN AWARENESS THROUGH HUMAN RIGHTS IMPACT ASSESSMENTS (HRIAs)

Identification of company’s human rights actual and potential impacts and their root causes in the company’s most relevant supply chains through the use of **Human Rights Impact Assessments** (HRIAs) under Oxfam’s methodology that also incorporate agreed **Action Plans** to implement the resulting recommendations in order to prevent, mitigate and repair those actual and potential identified impacts.

Main achievements:

- ▶ Human Rights Impact Assessments in **Ecuador, Morocco and Colombia** and their related 3 years Action Plans in each country to prevent, mitigate and repair human rights impacts.

OTHER AREAS OF COLLABORATION

Strengthening Social Projects

Oxfam’s roadmap has included an advisory component to support the strengthening of the projects on Education and Health that Bolton Food has been developing since 2019, in two of the countries where the HRIAs have been implemented (Ecuador and Morocco), as part of its commitment to support its employees, their families, and the communities in which the company operates.

Following the assessment conducted in Ecuador, Oxfam established a set of recommendations for the company:

- › Engage employees in the design, monitoring, and evaluation of the Social Projects Plan.
- › Strengthen projects with a particular emphasis on women.
- › Continue reinforcing the support for the community.
- › Enhance internal communication about social projects.
- › Conduct employee satisfaction surveys regarding the projects.

In the case of Morocco, after the assessment, Oxfam made the following recommendations:

- › Continue strengthening social projects with a specific focus on women.
- › Include agency workers in Social Projects.

It is worth mentioning that most of the recommendations made by Oxfam for Ecuador in 2022, such as engaging employees in the design, monitoring, and evaluation of the Social Projects Plan, conducting employee satisfaction surveys, and putting emphasis on women, have already been implemented by Bolton Food in Ecuador and Morocco.

SOCIAL PROJECTS’ BENEFICIARIES IN 2024

ECUADOR

- › Employees: 689
- › Children: 918
- › Other relatives: 29
- › Schools: 3

MOROCCO

- › Employees: 299
- › Children: 223
- › Other relatives: 18
- › Schools: 6

2176 Total absolute beneficiaries

9 Supported schools

EDUCATION

Literacy Program for Employees
School scholarships
Summer Camp for children and teenagers
Extracurricularclasses
School Support

HEALTH

Private consultations:
Pediatrician, Gynecologist, Psychologist, Dermatologist, Traumatology
Pregnancy
Cervix cancer
Breast cancer
Maternal, newborn & baby supplies
Oral Health
Eyes Health
Health Urgencies and Special Treatments
Disable people

PARTNERSHIP PILLAR
1. HUMAN AND WORKERS RIGHTS POLICIES ASSESSMENT

As the UN Guiding Principles on Business and Human Rights states, respecting human rights is a responsibility that all companies share. To meet this responsibility, companies should have in place:

- › A policy commitment to respect human rights, following the best international standards;
- › A human rights due diligence process to identify, prevent, mitigate and account for how they address their impacts on human rights;
- › Processes to enable the remediation of any adverse human rights impacts they cause or to which they contribute.

Oxfam’s approach to support Bolton Food in the development and implementation of an impactful human rights strategy started in 2020, with an in depth evaluation of existing human rights-related corporate commitments and policies. Through this process, Bolton Food committed to improve and strengthen its corporate policies on human rights.

Activities in this phase have included:

- › Revision of Bolton existing global and regional policies, in force at the beginning of the assessment, regarding human rights and social issues;
- › Assessment and identification of policy gaps to be addressed, with a focus on most relevant geographical areas;
- › Identification of main policy actions to be taken at different level to address risks;
- › Support on developing new and updated policies in terms of policy commitment to human rights, governance, due diligence and complaint (grievance) mechanisms.

This work was carried out from 2020 to 2024 resulting in a new policy structure for Bolton Food and, in some cases, in the development of new policies applied not only to the Food Business Unit, but also to Bolton as a whole.

NEW POLICY STRUCTURE ADVISED BY



2022-2023	➤	BOLTON HUMAN RIGHTS POLICY	BOLTON FOOD CODE OF CONDUCT FOR VESSELS
2024	➤	BOLTON SPEAK UP POLICY	BOLTON FOOD DUE DILIGENCE MANAGEMENT SYSTEM


1.1 BOLTON HUMAN RIGHTS POLICY

The Bolton Human Rights Policy is directly derived from the core values of the company as expressed in its Code of Conduct and it is aligned with best international standards: Ethical Trading Initiative (ETI) Base Code, International Labor Organization (ILO) Core Conventions, and the United Nations Guiding Principles on Business & Human Rights (UNGPs). These, together with the Bolton Code of Conduct, are at the top of the Bolton’s corporate governance framework.


The Human Rights Policy covers
9 fundamental principles:

- 1. Regular and Freely Chosen Employment
- 2. Freedom of Association and Collective Bargaining
- 3. Health, Safety and Working Conditions
- 4. Abolition of Child Labor
- 5. Living Wages
- 6. Respect of Working Hours
- 7. Elimination of Discrimination and Harsh treatment
- 8. Rights of Local Populations
- 9. Reporting breaches


Notable highlights:



Living Wages: the company established the commitment to create favorable conditions for enabling living wages for workers to maintain a decent standard of living.



Child labor: the company goes beyond the ILO 138 (which allows 15 years old to be employed, and the employment of persons 13 to 15 years of age for light work) by not employing children under the age of 16.



Working hours: the regular working week shall not exceed 48 hours and the sum of regular and overtime hours in a week shall not exceed 60 hours. Extra hours shall be voluntary and paid at a minimum premium rate of 125%.



Reporting breaches: it includes the implementation of owned, appropriate, secure and confidential reporting tools to report grievances, human rights or labor rights violations or any other kind of breaches of the principles set forth in the Human Rights Policy, aligned with the UN Guiding Principles on Business and Human Rights.



Due Diligence Management System: apart from the aforementioned Principles, it also includes the implementation of a due diligence process in order to establish verification and compliance mechanisms, both internally and throughout its supply chain. In the event that any supplier or other relevant stakeholder is facing challenges to adhere to Bolton policies, the company will take the necessary steps to correct the situation, working together with the affected parties and stakeholders to identify the root causes of the problem, finding and implementing effective ways to correct them and verifying their effectiveness in resolving the incident.



1.2 BOLTON FOOD CODE OF CONDUCT FOR TUNA SUPPLIERS (VESSELS)

This Code addresses each of the **9 fundamental rights** included in the Bolton Human Rights Policy, providing additional specific commitments which guarantee **sea workers' social and labor rights** to be requested on tuna suppliers conducting operations at sea. It is based on the International Labor Organization Core Conventions and aligned with the **C188 Work in Fishing Convention**.

Notable highlights:



Living Wages: inclusion of the living wage commitment as it is in the Human Rights Policy.



Resting hours: following ILO 188, for vessels remaining at sea more than 3 days, minimum hours of rest shall not be less than 10 hours in any 24-hour period, and average of 77 hours per week over the entire duration of the trip.



Child labor: The company goes beyond ILO 188, (which allows a minimum working age of 16 to work on board a fishing vessel) by not allowing crew under the age of 18 years.



It also includes a **Due Diligence** process in order to establish verification and compliance mechanisms both internally and throughout its supply chain.

1.3 BOLTON FOOD DUE DILIGENCE MANAGEMENT SYSTEM INTERNAL PROCEDURE

A due diligence is the ongoing process through which an organization puts in place a set of tools or measures - policies and procedures - to identify, avoid, mitigate, remedy and communicate how the current and potential negative impacts caused by its activity, its supply chain or other business partners (subsidiaries, subcontractors, and other stakeholders) are addressed to honor its responsibility regarding the sustainable management of the people, the environment and society.

The **Bolton Food Sustainability Due Diligence Management System** has been developed by Bolton Food taking into account Oxfam's suggestions based on its vision and principles regarding the protection of human rights. It is based on the *UNGP (United Nations Guiding Principles on Business and Human Rights)* and informed by the best international standards such as the *OECD (Organization for Economic Cooperation and Development) Guidelines for Multinational Enterprises*, *Global Reporting Initiative (GRI) Standards*, *ISO 14001*, *Principles for Responsible Investment (PRI)*, the *Codex Alimentarius* and the *BRC, IFS and ISO 22000 Food Safety* standards.

Bolton Food Due Diligence Management System will enable the company to:

1. Identify its actual and potential risks and impacts on human rights, environmental issues and food quality derived from its direct activities and along the supply chain.
2. Redress the negative impacts it causes, contributes to or are linked to it along its supply chain in order to prevent, mitigate and remedy them through a corrective action plan.
3. Measure and communicate its improvements and commitments.

This System underscores company's dedication to upholding human rights principles, ensuring decent work conditions and inclusion, safeguarding worker well-being, protecting the environment, promoting sustainable procurement practices, and guaranteeing food quality and safety. This approach goes beyond mere regulatory compliance, bolstering the company's reputation, mitigating operational risks, and cultivating trust among consumers, investors, and stakeholders through a holistic commitment to sustainability and responsibility in every facet of its operations.

Following international standards and the new European legislation, this identification of impacts is based on a risk evaluation which permits to categorize suppliers by their risk level.

The level of risk for a supplier is determined by combining two key factors:

1. Country and sectoral risk
2. Strategic relevance of the supplier.

The country and sectoral risk considers governance, human rights, environmental protections and food safety standards, while strategic relevance evaluates the supplier's criticality to business operations based on supply volume, uniqueness, dependency, and potential business impact.

The resulting scores classify suppliers into these categories:

- high risk
- medium risk
- low risk

Following international standards and new European legislation (mainly Corporate Sustainability Due Diligence Directive - CSDDD) must identify its actual and potential impacts derived from its direct activities and along the supply chain. This identification of impacts must be accompanied by a risk evaluation which permits to categorize their suppliers by the risk level (likelihood and impact on business continuity). Finally, this categorization allows to allocate adequately the limited resources by focusing the attention onto the most risky suppliers.

STAKEHOLDER'S ENGAGEMENT

In accordance with international standards, ensuring meaningful stakeholder engagement along the due diligence process is critical to ensure companies adequately identify and address impacts and take the appropriate measures to prevent or mitigate them. The company will consult stakeholders - including employees, other individuals, groups, communities, and entities potentially affected - to identify impacts and develop prevention and corrective action plans ensuring that those consultations are in good faith, practical, meaningful, timely, informed and adapted to the needs and rights of specific, vulnerable groups and that this consultation outcome is adequately communicated to those stakeholders.

1.4 BOLTON SPEAK UP POLICY

Bolton values transparency and encourages a listening environment. Thus, Bolton has established a single and comprehensive violation reporting mechanism in line with the highest standards of mature Whistleblowing Management Systems and international Grievance Mechanisms, to report and consistently manage possible Wrongdoings including Breaches, Human Rights Violations and Interpersonal Complaints.

The Bolton Speak Up Policy, drafted by Bolton, guided by Oxfam's suggestions to ensure alignment with its vision and principles for protecting human rights, and also aligned with the UNGPs as committed in the Bolton Human Rights Policy, includes the company's commitment and the procedure to be followed in the event of wrongdoing or violation of Bolton's Code of Conduct and Human Rights Policy, either internally or by third-party partners of the company that are damaging for those affected, Bolton, people and society.

It covers the following Principles:

- › Confidentiality and anonymity.
- › Transparency in the operation and process.
- › Impartiality, independence and professionalism.
- › Prohibition of retaliation protecting Reporters and other interested parties involved.

Additionally, the Policy stated that Bolton should provide appropriate measures to make the Internal Parties and External Parties aware about the Speak Up system, including its policy, the process to follow and the compliance requirements; and to train the Speak Up Managers and the personnel supporting the process using documented evidence.

It also ensures meaningful stakeholder and workers engagement to design and implement **Local Operational Onsite Grievance Mechanisms** and implement training sessions, communication and awareness programs for all internal and external stakeholders. These Local Operational Onsite Mechanisms based on local needs, including specific antiharassment protocol and specific channels for gender sensitive issues, will ensure that workers and affected communities feel empowered to speak up and can easily access, enable and activate an efficient mechanism in providing a remedy thanks to the proximity to the place and context where the problems occur.



PARTNERSHIP PILLAR
2. HUMAN RIGHTS IMPACT ASSESSMENTS

WHAT IS A HUMAN RIGHTS IMPACT ASSESSMENT (HRIA)?

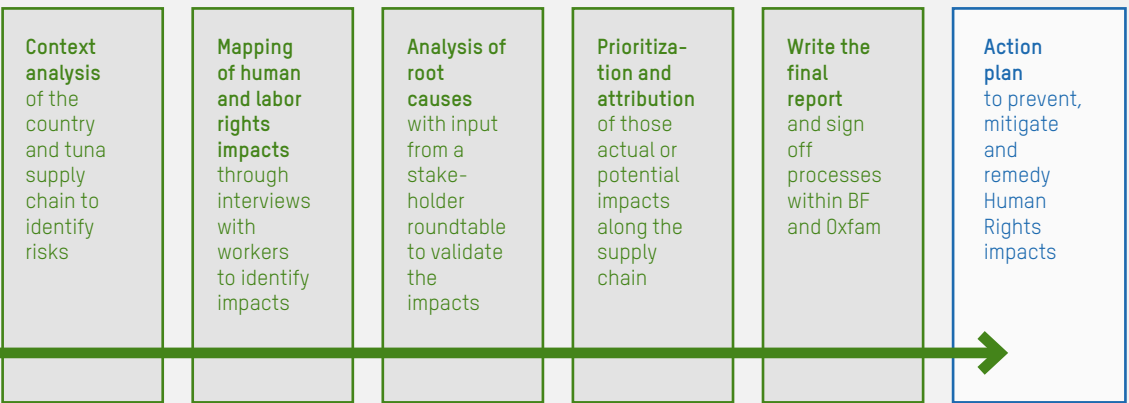
Human Rights Impact Assessments (HRIAs) are a **research and evaluation model for understanding, identifying and addressing the adverse impacts of business practices on human rights in high-risk supply chains**. To guarantee the quality of HRIAs, Oxfam has developed a specific methodology, aligned with the *UN Guiding Principles on Business and Human Rights (UNGPs)* and informed by the *OECD Due Diligence Guidance for Responsible Business Conduct*, managed by independent researchers which includes the participation of all stakeholders and key actors along the supply chain (workers, civil society organizations and NGOs, Trade Unions, authorities, professional associations, international organizations...). **This methodology, which goes beyond mere documentary verification through audits, helps to understand the real nature and causes of human rights violations in order to establish the adequate procedures to prevent, mitigate and remedy these impacts.**

Thus, it also draws on the field of international political economy and notably on that of the Global Value Chain Analysis, which analyses the systemic issues and structures that influence value chains, rather than the actions of any individual player.

This methodology is also key to ensure that the assessment identifies all relevant adverse risks to human rights in order to support companies in understanding how their business practices have **actual and/or potential impacts**, and to lead to **concrete corrective actions** to guarantee the respect of human, social and labor rights for workers along global supply chains.

It consists of **5 phases** shown below, followed by a **company's Action Plan** to implement Oxfam's recommendations on how to address negative human rights impacts.

HRIA'S OXFAM METHODOLOGY



KEY PRINCIPLES OF OXFAM'S METHODOLOGY IN CONDUCTING A HRIA

RIGHTS-HOLDERS' PARTICIPATION

Conducting a Human Rights Impact Assessment implies a human rights-based approach, which requires ensuring **meaningful stakeholder engagement** by rights-holders, duty-bearers and other stakeholders within and outside company's own operations based on a non-discriminatory, empowering, accountable and transparent assessment. Only through this dialogue could impacts be properly identified and the actions needed to be taken to prevent and mitigate impacts determined and eventually timely remediation being taken. Then, the actions that the company undertakes should address the root causes of the identified impacts and should be defined together with the different stakeholders, especially rights holders, in a participative process carried out in good faith, effective, meaningful, timely and informed manner. They must be tailored to the needs and rights of specific vulnerable groups. Companies must ensure that the results of consultation are duly considered and that these results are adequately communicated to stakeholders.

Apart from interviews with stakeholders, this methodology includes the participation of stakeholders through a **roundtable discussion** aimed at verifying the preliminary findings of the analysis, identifying root causes of the issues detected and discussing potential solutions to prevent and mitigate negative impacts on labor and human rights.

GENDER PERSPECTIVE

A **gender-sensitive analysis** is also an integral and stand-alone aspect of the assessment. Therefore, gender consideration is incorporated by Oxfam into the objectives and throughout the assessment, also taking into account the use of female workforce in the processing plants, through a gendered analysis of roles and a consideration of differentiated impacts on women and men.

HUMAN RIGHTS IMPACTS ASSESSMENTS IN BOLTON

Given the complexity of the tuna global supply chain, Oxfam and Bolton decided to focus on Bolton's most relevant seafood supply chains: **Ecuador** (own facility and vessels), **Morocco** (owned facility) and **Colombia** (facility owned by Tri Marine, main Bolton Food's supplier in Latin America, that had just merged with Bolton Food in January 2025).

TIMEFRAME 2020-2024

Ecuador	Morocco	Colombia
2021-2022	2023-2024	2024- ongoing

These assessments conclude that Bolton Food’s operations conform to industry norms and the company has already committed to improving social conditions for its employees, with some meaningful advances already achieved. However, these impact assessments reveal risks to human rights and related impacts along its tuna supply chain that might not be apparent without engagement with the right stakeholders and deeper sector and country research.

The focus groups conducted with workers (mostly blue collars) were, in all the countries, on a voluntary basis and at a venue that allowed a safe space for workers to speak more openly and freely. Responses were kept completely confidential. Thanks to this participatory process, Bolton Food has been provided with important outputs to identify current or potential human rights impacts that the business is causing along the supply chain. Thus, the company was able to learn more about the daily reality of workers and their perceptions of how human rights are treated within the company providing meaningful insights on critical issues that might entail impacts on workers’ human rights, such as:

- › **Wages:** exploring whether the wage for a full-time working week (without overtime) is enough for a family to meet its basic needs and allow a small amount for discretionary spending.
- › **Health and Safety:** exploring whether working conditions are safe and hygienic and workers receive regular training.
- › **Working hours:** exploring whether working hours are not excessive and that overtime is voluntary and compensated at a premium rate.
- › **Discrimination:** exploring whether diversity is respected along with the right to equal opportunities for all, with a major focus on gender-based discrimination, sexual harassment and women’s rights.
- › **Access to remedy:** exploring whether there are appropriate, secure and confidential reporting tools to report grievances, human rights or labor rights violations.
- › **Freedom of association:** exploring whether workers, without any distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.

It was a very helpful learning exercise and the results have served as a prompt to question current policies and practices and to identify where improvements are needed.

The main recommendations proposed by Oxfam to Bolton Food, based on the Human Rights Impact Assessment’s findings and the prioritisation of human rights impacts, include specific actions that the company can take with regard to its own policies and practices; actions that the company can take to influence others to change their policies and/or practices to mitigate the risks of adverse impacts in its operations.

Human Rights Impact Assessments
MAIN DATA SOURCES

..... **ACADEMIC AND GREY LITERATURE**

for a comprehensive documental review on the tuna fishing sector, including trends in supply chains (e.g. prices, volumes, etc)

..... **CORPORATE DOCUMENTS**

..... **28 SEMI-STRUCTURED INTERVIEWS**

(8 in Ecuador, 5 in Morocco, 15 in Colombia) with Bolton Food staff from a range of global and local functions such as Procurement, Human Resources, Sustainability and Fleet

..... **DATA SOURCED FROM A RELEVANT NUMBER OF OTHER KEY STAKEHOLDERS**

from each of the countries, including representatives of canned tuna workers, national tuna associations, international organizations, civil society and union actors

..... **RIGHTS-HOLDER INTERVIEWS (145 IN ECUADOR, 159 IN MOROCCO, 164 IN COLOMBIA)**

organized through focus groups with workers, on a voluntary basis, from processing plants, suppliers and peer companies from each of the countries. In the case of Ecuador, this included workers on fishing vessels owned by Bolton Food;

..... **ROUNDTABLE DISCUSSION,**

virtual in Ecuador (because of COVID restrictions) and in person in Morocco and Colombia, with representatives of workers, industry associations, canned tuna companies, Trade Unions, international non-governmental organizations (NGOs), competitors and International Organizations.

ECUADOR

The first Human Rights Impact Assessment (HRIA) conducted by Oxfam on behalf of Bolton Food was developed in **Manta** (Manabí, Ecuador), home to the country's largest tuna fishing fleet and one of the most strategic tuna markets and supply chains in the world. In Manta, at **Conservas Isabel Ecuatoriana**, Bolton Food processes raw materials coming from both the four tuna fishing vessels it owns and from other suppliers (plants and vessels). In 2021, the factory employed more than 1.600 workers, 76% of whom were performing manual tasks (blue-collar workers). Women made up the majority of the manual workers (76%). In addition, the fleet employed 213 workers, 77% of them were blue-collar workers.

The overall assessment and report writing took two years (2021-2022).

Due to COVID-19 limitations that prevented Oxfam researchers to travel in Ecuador, focus groups were conducted and managed by CISP (the International Committee for the Development of Peoples), an Italian NGO that has been active in Ecuador for more than 30 years and is specialized in the seafood sector.

Rights-holders' engagement:

Considering the organization of Bolton Food's business operations in its canned tuna supply chain in Ecuador, different categories of rights-holders were identified and interviewed for the purposes of this assessment, with a total of **145 rights holders** engaged through **15 focus groups**:

Plant workers

A total of 105 workers divided into:

- › Conservas Isabel Ecuatoriana workers: a total of 71 workers (56 women and 15 men).
- › Workers employed in canned tuna processing plants in the city of Manta: a total of 34 workers; 17 workers (10 women and 7 men) belonging to Bolton Food supply chain and 17 workers from other companies (14 women and 3 men).

Sea workers

A total of 40 male workers divided into:

- › Bolton Food vessels' workers: a total of 30 workers (0 women and 30 men)
- › Workers employed on vessels from other companies: a total of 10 workers from other companies (0 women and 10 men).

Moreover, **23 other key stakeholders** – including representatives of Ecuadorian tuna canneries workers, Ecuadorian civil society, union actors, local and national authorities, tuna national associations and international organizations – were engaged through participation in a virtual **stakeholders roundtable** discussion convened for this assessment, which took place over two half-days.





MOROCCO

The second Human Rights Impact Assessment carried out by Oxfam was at **Nouvelle Cosarno**, Bolton Food's tuna cannery in **Agadir**, Morocco. In 2022, the factory employed 428 workers, 90% of whom were performing manual tasks (blue-collar workers). Women made up the majority of the manual workers (71%). Tuna raw material processed in Agadir comes from a single supplier, Bolton's company Tri Marine. Consequently, the findings of this study do not cover the human rights situation in the entire supply chain in the country, including fisheries, and define only recommendations for the management of human rights at the production stage.

Overall, the assessment and report took 2 years to complete (2023-2024).

Rights-holders were involved in the analysis through focus groups conducted and managed by Oxfam Morocco in partnership with the local women's rights organization *Association Voix de Femmes Marocaine (AVFM)*, which also provided the venue to allow a safe space for workers to speak more openly and freely. Workers participated in the focus groups on a voluntary basis.

Rights-holders' engagement:

Considering the organization of Bolton Food's business operations in Morocco, two main groups with a total of **159 rights-holders** were identified and interviewed for the purposes of this assessment through **16 focus groups**.

Plant workers

A total of 159 workers divided into:

- › Nouvelle Cosarno workers: A total of 105 workers (71 women and 35 men).
- › Workers employed in canned fish processing plants in Agadir: A total of 53 workers (35 women and 18 men), including canned sardine, tuna and shrimp.

Moreover, **22 stakeholders** - including representatives of workers, industry associations, Trade Unions, authorities, Moroccan canned tuna companies and international non-governmental organizations (NGOs) were engaged in an on-site **multistakeholder roundtable** in Agadir.

COLOMBIA

The third human rights impact assessment (HRIA) was carried out by Oxfam at **Gralco**, Bolton Food-Tri Marine's tuna cannery in **Barranquilla, Colombia in 2024** and it is already ongoing. The factory employs approximately 850 workers, 85% of whom are agency workers performing manual tasks (blue-collar workers). Women make up the majority of the blue-collar workers (66%).

The overall assessment and report writing took one year and a half (2024).

Rights-holders were involved in the analysis through an in depth questionnaire and focus groups conducted and managed by Oxfam Colombia and supported by an independent consultant.

It is important to note that this HRIA was carried out at a time of transition of the plant production model, after the merger process of Bolton Food and Tri-Marine. Previously, the plant had not procured a continuous supply of tuna during the year. Since the merger with Bolton Food, the Group has been carrying out a strategic analysis to identify the plant's competitive advantages, make the most of those advantages and ensure a continuous supply. These production changes have direct implications for the workers: this can be considered as an opportunity, as the HRIA comes at a time of change, allowing the company to identify current and potential impacts and draft an action plan to go hand in hand with its change in business strategy.

Rights-holders' engagement:

Considering the organization of Bolton Food's business operations in its canned tuna operations in Colombia, one main group of **164 rights-holders** was identified and interviewed for the purposes of this assessment, through an in depth questionnaire and **10 focus groups**. Limitations that are discussed in the full HRIA report prevented the Oxfam team from interviewing employees working in other tuna companies in Colombia.

Plant workers

A total of 164 workers:

- 141 women and 23 men; 133 agency workers and 31 Gralco workers. All the total 164 workers carried out the in depth interviews; 93 workers (74 women and 19 men) participated in the focus groups.

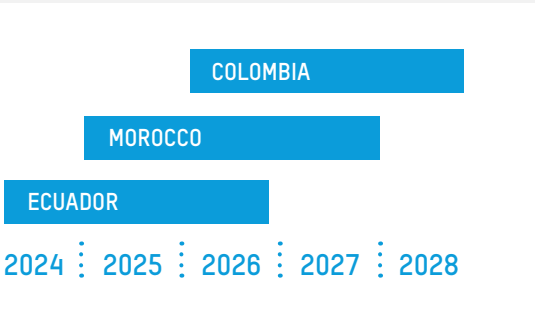
Moreover, **21 other key stakeholders** – including representatives of workers, local civil society organizations, local authorities and other partners – were engaged through participation in a full day **roundtable discussion** convened in Barranquilla.

Some limitations prevented the Oxfam team from interviewing employees working in a company in the same sector in Cartagena. The involvement of local stakeholders and rights-holders (factory workers) was ensured by Oxfam Colombia's staff, supported by an independent consultant.



ACTION PLANS

Based on the recommendations that Oxfam has made, taking into account the impacts on human rights found along the three assessments, Bolton Food has outlined a comprehensive **three-years Action Plan for each HRIA:**



These Action Plans aim to prevent, mitigate and remedy the current and potential impacts that have emerged from these assessments. They take into consideration: the impacts that the company is causing in its own operations; the impacts it is linked or contributing to in its suppliers’ operations.

The Action Plans have **7 main pillars of steps** which follow the priorities identified by Oxfam through the assessments. They will be implemented in a participatory process involving all affected stakeholders:

- **LIVING WAGE**
To establish an **own living wage calculation for the tuna sector**. The pilot scheme will be carried out starting from Manta, advised by an expert partner (Oxfam) and designing a sustainable roadmap to bridge possible gaps. The goal is to apply it to the Agadir and Barranquilla processing plants.
- **AGENCY WORKERS**
To design a medium term plan for the stabilization of agency workers, where they are used excessively, based on the future production requirements.
- **TRAINING SESSIONS ON RIGHTS AND OBLIGATIONS**
To develop training sessions and effective internal communication activities in order to increase awareness among Bolton Food workers on financial culture, terms of the contracts, human rights, gender and diversity, freedom of association, access to remedy, health and safety, etc. and to design and implement a robust and comprehensive training program on “ethic leadership” for all managers, where needed, and design, in collaboration with expert external bodies, a clear and fair disciplinary procedure for those

managers/executives who exercise any abuse of power and harassment. This commitment includes completing job descriptions and payment procedures and to communicate them to all workers.

SOCIAL PROJECTS

- To strengthen **Bolton Food Social Projects on Education and Health** for the employees, their families and the community, focused on vulnerable people such as single-parent householders and specific health projects for women, with the participation of the workers associations/Trade Unions in their design and evaluation.

GRIEVANCE MECHANISM

- To implement a Grievance Mechanism under the *UNGPs* along the entire supply chain and external stakeholders to report and consistently manage possible breaches and Human Rights violations, by ensuring meaningful stakeholder and workers engagement aimed at designing and implementing **Local Operational Onsite Grievance Mechanisms** and implement trainings, communication and awareness programs for all internal and external stakeholders. This Local Operational Onsite Grievance Mechanisms based on local needs, including specific channels for women, will ensure that workers and affected communities feel empowered to speak up and can easily access and enable an efficient mechanism in providing remedy by being located closest to where problems occur.

COLLECTIVE BARGAINING

- To facilitate effective workers’ voices in the plant and on vessels with a proper monitoring by opening a dialogue with workers’ representatives and Trade Unions to consolidate the current measures and find ways to improve social dialogue (also for agency workers) advised by an expert partner.

GENDER, DIVERSITY AND INCLUSION

- To build and implement a **Gender and Diversity Equality Plan** and an effective and secure “Anti-harassment Protocol” with a roadmap to implement it advised by an expert partner (Oxfam), including a training program adapted to all staff and an independent third-party monitoring mechanism to assess the effectiveness of the company’s gender equality initiatives.

..... DUE DILIGENCE

To support and encourage suppliers to improve working conditions through the new Bolton Food Code of Conduct for Suppliers (which includes the Bolton Human Rights Policy, the Bolton Code of Conduct and the Bolton Food Code of Conduct for Vessels), through the implementation of the Bolton Food Due Diligence Management System, guided by Oxfam to ensure alignment with its vision and principles for protecting human rights.

..... ADVOCACY

To collaborate with industry peers and other stakeholders to advocate and address industry-level root causes such as gender-sensitive wage laws, living wages, ILO Conventions ratifications and other industry norms recommended by Oxfam.

Bolton and Oxfam are directly involved in the implementation or in the monitoring of some of the key pillars of the Action Plan and are also continuing this journey, working together over the next 4 years as part of a partnership renewal.

PARTNERSHIP PLAN 2025-2028

Bolton Food and Oxfam have agreed an updated **4 year roadmap of activities for 2025-2028**, consisting of **6 main workstreams**:

1. **Risk Assessment and supply chain awareness:** Human Rights Impact Assessments in two other key seafood supply chains for Bolton in Asia.
2. **Action Plans:** implementing effective action plans to prevent and mitigate actual and potential human rights impacts based on HRIAs recommendations in Ecuador, Morocco and Colombia.
3. **Living Wage Projects:** Oxfam will support the company to move forward in its commitment to create favorable conditions for enabling living wages for workers to maintain a decent standard of living. Based on the results of a Living Wage Pilot in Ecuador, the methodology will be adapted and applied to Morocco and Colombia.
4. **Due Diligence:** Oxfam will support the company to fully understand and overcome challenges in each phase of the human rights due diligence cycle through, for example, the strengthening of the engagement with affected stakeholders, including the design of scalable models and incorporating stakeholder voice into salience exercises and evaluation.
5. **Influencing and Advocacy:** strengthen and mutually support advocacy activities in relation to the adoption of policies and practices protecting human rights in the tuna sector at global and local level.
6. **Communication:** engaging different audiences to promote partnership's shared values.



FOR FURTHER INFORMATION

Oxfam:

- › <https://www.oxfam.org/en>

Oxfam Italy:

- › <https://www.oxfamitalia.org/>

Oxfam-Bolton Food best practice:

- › <https://advisory.oxfam.it/aziende-partner/bolton-food/>

Oxfam Italia Advisory Service:

- › <https://advisory.oxfam.it/>

Oxfam Human Rights Impact Assessment:

- › <https://advisory.oxfam.it/human-rights-impact-assessment/>

Oxfam Human Rights Impact Assessment Framework

- › <https://policy-practice.oxfam.org/resources/human-rights-impact-assessment-framework-621501/>

Oxfam Human Rights Impact Assessment of Bolton Food tuna canned supply chain in Ecuador:

- › <https://policy-practice.oxfam.org/resources/human-rights-impact-assessment-of-bolton-foods-canned-tuna-supply-chain-in-ecua-621544/>

Oxfam Human Rights Impact Assessment of Bolton Food tuna canned supply chain in Morocco:

- › <https://policy-practice.oxfam.org/resources/human-rights-impact-assessment-of-bolton-foods-canned-tuna-supply-chain-in-morocco-621715/>

Oxfam annual report 2023-2024:

- › <https://annualreport.oxfam.org/2025/en/the-power-of-people/index.html>

Oxfam Briefing Paper: “An Economy for the 99%: It’s time to build a human economy that benefits everyone, not just the privileged few”:

- › <https://policy-practice.oxfam.org/resources/an-economy-for-the-99-its-time-to-build-a-human-economy-that-benefits-everyone-620170/>

Business and Human Rights. An Oxfam perspective on the UN Guiding Principles:

- › <https://oxfamilibrary.openrepository.com/bitstream/handle/10546/293857/tb-business-human-rights-oxfam-perspective-un-guiding-principles-130613-en.pdf?sequence=14>

Oxfam: Human Rights Due Diligence: An overview

- › <https://www.oxfamamerica.org/explore/research-publications/human-rights-due-diligence-an-overview/>

UN Guiding Principles on Business and Human Rights:

- › https://www.ohchr.org/sites/default/files/documents/publications/guidingprinciple-sbusinessshr_en.pdf

Bolton Group Human Rights Policy:

- › https://www.bolton.com/sites/default/files/2024-07/Human-Rights-Policy_EN_2024%20%281%29.pdf?_gl=1*16z69dk*_up*MQ..*_ga*MTAzNDMyMjY1OC4xNzQ50-DIzNTAx*_ga_HWMWLJDVDH*cZE3NDk4MjM1MDEkbzEkZzEkdDE3NDk4MjM1MDUkajU2J-GwwJGgw

Bolton Food Code of Conduct for Tuna Suppliers (Vessels):

- › https://www.bolton.com/sites/default/files/2024-10/BF_Code-of-Conduct-for-tuna-suppliers-Vessels-2.pdf?_gl=1*1xgji7*_up*MQ..*_ga*MTAzNDMyMjY1OC4xNzQ50DIzNTAx*_ga_HWMWLJDVDH*cZE3NDk4MjM1MDEkbzEkZzEkdDE3NDk4MjM1MDUkajU2JGwwJGgw

Bolton Group Speak Up Policy:

- › https://www.bolton.com/sites/default/files/2025-01/Bolton%20Speak%20Up%20Policy%20FY24_ENG.pdf?_gl=1*u7ve91*_up*MQ..*_ga*MTAzNDMyMjY1OC4xNzQ50DIzNTAx*_ga_HWMWLJDVDH*cZE3NDk4MjM1MDEkbzEkZzEkdDE3NDk4MjM1MDUkajU2JGwwJGgw

Bolton’s commitment to people:

- › <https://www.bolton.com/commitment/people>

Bolton Food:

- › <https://www.bolton.com/categories/food>

Bolton's tuna supply:

- › <https://www.bolton.com/categories/tuna-supply>

Bolton's Sustainability Reports:

- › <https://www.bolton.com/commitment/reports>

PHOTO CREDITS

- › Cover: *female workers in Bolton's tuna plant in Manta, Ecuador*. Credit: Bolton
- › Page 6: *Bolton Food's CEO Luca Alemanno*. Credit: Bolton
- › Page 7: *Oxfam Italy's Executive Director Roberto Barbieri*. Credit: Michele Borzoni/Oxfam
- › Page 9: Credit: Fabeha Monir/Oxfam
- › Page 39: *participants to stakeholder roundtable in Barranquilla, Colombia*. Credit: Oxfam/Bolton
- › All the other pictures in the report feature workers in Bolton's tuna plants in Ecuador, Morocco and Colombia and fishermen on vessels in Ecuador. Credit: Bolton



OXFAM AND BOLTON TOGETHER FOR A HUMAN ECONOMY

For fair and sustainable food

Oxfam and Bolton advocate for responsible business and are working together towards an economic model based on respect for human rights and more equitable, inclusive supply chains.



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