

Responsible Quality – Control Points

PILLAR FISHING (TUNA)				
No.	Verification Scope	Reference Criteria ACCEPTABLE	Reference Criteria NOT ACCEPTABLE	Actions to be taken if not acceptable
1. COMPANY CERTIFICATIONS				
1	Third-party audit: ISO 22005 – Traceability in the food and feed supply chain	Certification valid; any NCs actively managed	Loss of certification; unmanaged NCs	Loss of certification: new initial audit. Unmanaged NCs: root-cause analysis, corrective actions, treatment
2	Third-party audit: BRC / IFS (or FSSC 22000) – Processing facilities	Valid food safety certification; NCs managed	Loss of certification; unmanaged NCs	Loss of certification: new initial audit. NCs: root-cause analysis, corrective actions, assessment of food safety impacts
3	Third-party audit: MSC Chain of Custody – Processing facilities	Valid MSC CoC certification; compliant product segregation and identification	Loss of certification; non-conformities in CoC management	Loss of certification: new initial audit. CoC NCs: root-cause analysis, corrective actions
4	Third-party audit: ISSF Compliance – Own fleet and suppliers	ISSF compliance maintained; any NCs managed	Unmanaged ISSF non-conformities; loss of ISSF status	Loss of status: new initial audit. NCs: root-cause analysis, corrective actions; impact on supplier and CoC assessments
2. TUNA RAW MATERIAL SUPPLIERS				
5	Documentary audit of checks carried out on tuna raw material suppliers in line with ISSF requirements and the company Tuna Sourcing Policy	ISSF requirements met; Tuna Sourcing Policy compliant; required documentation available	ISSF requirements not met; documentation missing or supplier not qualified	Request removal from the qualified supplier list or launch a requalification procedure
6	Verification of the launch and progress status of the Seafood Taskforce Risk-Based Assurance Program	Program launched – progress status assessed	Program not launched or incomplete; STF requirements not met	Launch the program; revise timelines and recovery plan
7	Traceability test – verification of chain of custody: reconstruction of the route from finished product to vessel/FAO fishing area	Compliant traceability: complete reconstruction within the prescribed timeframe	Incomplete or non-reconstructable traceability	Root-cause analysis; lot identification; possible CoC hold for the affected lot
3a. COMPANY PROCESSING FACILITIES				
8	On-site / remote and/or documentary audit of own processing facilities	Compliant CoC; physical segregation verified; correct product identification; NCs managed	Incorrect Chain of Custody management; lack of segregation or identification	Request identification and exclusion of the affected lot. Exclude the facility in case of major findings
9	On-site traceability test – verification of chain of custody: reconstruction from finished product to vessel/FAO area in ≤ 4 hours	Compliant traceability and reconstructable within 4 hours; differentiated lot code	Incomplete traceability; inability to reconstruct the route within the prescribed timeframe	Root-cause analysis; block production authorization for the lot; CAP with timeline; validation re-audit before resumption
3b. LOGISTICS				
10	Traceability test: verification of the chain of custody along the logistics channel (shipping, storage, distribution) – reconstruction from finished product to supplier/vessel	Compliant traceability throughout the logistics chain	Incomplete traceability; inability to reconstruct the route	Root-cause analysis; possible lot hold; request supplementary documentation
4. ASSESSMENT OF ACHIEVEMENT OF THE COMPANY’S VOLUNTARY PUBLIC GOALS				
	GOAL	Sub-goals		
	GOAL 1 More Sustainable Sourcing	Development of Sustainable Fishery Criteria; integration of IUU risk / flag state assessment; stock health monitoring; dependency on RFMO data quality; impact: critical for credibility		
	GOAL 2 Advocacy & Policy Change	Adoption of harvest strategies; 100% observer coverage; FAD management reform; protection of ETP species; dependency on multilateral negotiation cycles; long-term structural impact		
	GOAL 3 Traceability & Transparency	GDST interoperability pilot; integration of due diligence system; real-time vessel monitoring; dependency on technology adoption and supplier compliance; impact: risk mitigation and regulatory alignment		

PILLAR PEOPLE				
No.	Verification Scope	Reference Criteria ACCEPTABLE	Reference Criteria NOT ACCEPTABLE	Actions to be taken if not acceptable
1. COMPANY CERTIFICATIONS				
1	Third-party audit: SA8000 and equivalents (SMETA, BSCI)	Certification valid; any NCs actively managed	Loss of certification; unmanaged NCs	Loss of certification: new initial audit. NCs: root-cause analysis, corrective actions, treatment
2	Third-party audit conducted by Oxfam through the Human Rights Impact Assessment by country	Action Plan updated and being implemented; commitments met; HRIA report available	Action Plan not updated; commitments not met	Reactivate the HRIA process; review and update the Action Plan; escalate to Management
3	Third-party audit: ISO 45001 – Processing facilities	Certification valid; TRIR/LTIR within target limits; NCs managed	Loss of certification; TRIR/LTIR indicators outside target; unmanaged NCs	Loss of certification: new initial audit. NCs: root-cause analysis, corrective actions
4	Verification of adherence to the company's social policies (Human Rights Policy, Code of Conduct, Speak Up Policy)	Group social policies implemented, with results achieved and ongoing	Group social policies not implemented, with no demonstrable results	Promote implementation of the company's social policies – NCs to be managed
2. TUNA RAW MATERIAL SUPPLIERS				
4	Documentary audit of checks carried out on raw material suppliers	Supplier Code of Conduct signed and managed/monitored through the Sustainability Due Diligence Management System; Supplier Assessment Questionnaire with an acceptable score	Supplier CoC or Vessel CoC not signed; Supplier Assessment Questionnaire non-compliant	All high-risk suppliers audited on site by 2030 (2025: 12%); EcoVadis and/or remote audit for medium-risk suppliers; request Bolton to remove the supplier or initiate requalification; escalate to DDMS
3a. PROCESSING FACILITIES				
5	On-site audit / desk review of processing facilities – Oxfam HRIA	Documented Social Projects with progress assessment; Action Plan updated and being implemented; commitments met; HRIA report available	Action Plan not updated; commitments not met; unmanaged NCs	Reactivate the HRIA process; review and update the Action Plan; escalate to Management
6	On-site audit / desk review of processing facilities: SA8000 and equivalents (SMETA, BSCI)	Certification valid; any NCs actively managed	Loss of certification; unmanaged NCs	Loss of certification: new initial audit. NCs: root-cause analysis, corrective actions, treatment
7	On-site audit / desk review of processing facilities: ISO 45001	Certification valid; TRIR/LTIR within target limits; NCs managed	Loss of certification; TRIR/LTIR indicators outside target; unmanaged NCs	Loss of certification: new initial audit. NCs: root-cause analysis, corrective actions
8	On-site audit / desk review of processing facilities – verification of adherence to social policies: Human Rights Policy, Code of Conduct, Speak Up Policy	Group social policies implemented, with results achieved and ongoing	Group social policies not implemented, with no demonstrable results	Promote implementation of social policies – SGS NCs to be managed
3b. LOGISTICS				
6	Documentary audit of checks carried out on logistics suppliers	Supplier CoC signed; compliant SAQ for logistics suppliers	CoC not signed; non-compliant SAQ	Request Bolton to review the relationship with the logistics supplier; social audit for high-risk logistics suppliers; corrective action plan with timeline
4. ASSESSMENT OF ACHIEVEMENT OF THE COMPANY'S VOLUNTARY PUBLIC GOALS				
	GOAL	Sub-goals		
	GOAL P1 Human Rights Due Diligence	HRIA conducted; 3-year corrective action plans; risk assessment to evaluate supplier risk level		
	GOAL P2 Workers' Rights & Fair Labour	Living Wage: progress in calculation methodology; GM operations and UNGP testing; Gender & Diversity Plan; Speak Up compliance with EU Directive 2019/1937; dependency on local implementation capacity		
	GOAL P3 Oxfam Partnership & Community Impact	Renewal of partnership agreement; implementation of joint Action Plan; Social Projects with measurable beneficiaries; sector advocacy; dependency on strategic alignment with Oxfam		

Pillar Production				
No.	Verification Scope	Reference Criteria ACCEPTABLE	Reference Criteria NOT ACCEPTABLE	Actions to be taken if not acceptable
1. Environmental Certifications				
1	Third-party audit: ISO 14001 — Environmental Management System.	ISO 14001 certification valid; any NCs actively managed; environmental objectives monitored and updated	Loss of certification; unmanaged NCs; environmental objectives not monitored	Loss of certification: new initial audit. NCs: root-cause analysis, corrective actions, assessment of environmental impacts
2	Third-party audit: ISO 50001 — Energy Management System (where applicable/in progress).	ISO 50001 certification valid (where obtained); or documented roadmap progress; site energy KPIs monitored (specific consumption per unit produced)	Loss of certification; unmanaged NCs; energy KPIs not monitored; unjustified delay against roadmap	NCs: root-cause analysis, corrective actions. Roadmap delay: revise plan and communicate to SGS
3	Verification of validation/approval of SBTi (Science Based Targets initiative) targets	SBTi targets approved or in formal approval process; GHG inventory updated; documented emissions reduction plan with milestones	SBTi targets not defined or not submitted; GHG inventory not updated; reduction plan absent	Define and submit SBTi targets; update GHG inventory; integrate into the reporting system
4	Verification of progress against the Bolton Packaging Policy 2024	Packaging KPIs achieved or on track with documented milestones; % of recycled/renewable materials increasing against baseline; compliance with the EU Packaging Regulation (PPWR) verified	Packaging KPIs not achieved without justification; problematic materials not eliminated; PPWR non-compliance	Recovery plan with timeline; eliminate problematic materials; realign with the Packaging Policy and PPWR
2. Processing Facilities				
5	On-site / remote environmental audit of processing facilities: verification of the Environmental Management System (ISO 14001), compliance with permit requirements, site environmental KPIs	EMS compliant; environmental permits valid; environmental KPIs (specific water consumption, specific energy consumption, waste generation rate) within targets; environmental records updated	EMS non-compliant; permits expired or breached; KPIs outside target without a recovery plan; environmental records not updated	Identify environmental NCs; corrective action plan with timeline; notify competent authorities in case of permit violations; possible production suspension for major NCs
6	Water Risk Assessment and water management plan	WRA mitigation measures implemented; water consumption in line with site targets; active reduction/recycling program; water KPIs monitored (m³/tonne produced)	Mitigation measures not implemented; water consumption above target; reduction/recycling program absent; water KPIs not monitored	Corrective action plan to implement WRA measures; revise water targets; communicate to SGS and update WRA if necessary
3. Logistics and Supply Chain				
7	Verification of the environmental impact of logistics	Logistics emissions KPI monitoring available (CO₂/t-km);	Logistics emissions KPIs absent;	Define logistics emissions KPIs;
4. Assessment of Achievement of the Company's Voluntary Public Goals				
	GOAL	Sub-goals		
	GOAL PR1 Climate & Decarbonisation	SBTi target approval and implementation plan; renewable energy procurement; Scope 3 inventory methodology based on the GHG Protocol; dependency on the availability of renewable energy in countries of operation		
	GOAL PR2 Water Stewardship	WRA updated for all sites by 2028; site water management plan based on WRA; reduction/recycling programs; dependency on the quality of local water supply		
	GOAL PR3 Circular Packaging	Packaging redesign for recyclability; sourcing of recycled/renewable materials; compliance with the EU PPWR (Reg. 2024/1252); dependency on the availability of recycled materials on the market		

PILLAR NUTRITION				
No.	Verification Scope	Reference Criteria ACCEPTABLE	Reference Criteria NOT ACCEPTABLE	Actions to be taken if not acceptable
1. QUALITATIVE CONTROL POINTS				
1	The company actively participates in academic training projects (PhD scholarships, research fellowships, master's degree courses) in nutrition or food sustainability, co-funded by Bolton Food.	At least 1 PhD scholarship or research fellowship co-funded and active during the audit year; documented agreement with a university.	No active scholarship/fellowship; academic agreements expired without renewal.	Minor NC with activation plan for the following year. Request Bolton to provide the university agreements.
2. QUANTITATIVE CONTROL POINTS				
2	No. of peer-reviewed scientific articles sponsored/co-authored by the company on nutrition/seafood topics in the last two years.	≥ 2 articles published in the two-year period; authorship/sponsorship scope defined and applied; verifiable on PubMed.	< 2 articles in the two-year period; Bolton sponsorship not documented; articles not traceable in public databases.	Minor NC if below target, with a publication plan for the following year.
3	No. of active research partnerships in nutrition with universities or accredited research centres.	≥ 2 active research partnerships documented by valid formal agreements; definition of 'active partnership' agreed with SGS.	< 2 active partnerships; agreements expired without renewal; no shared definition of 'active partnership'.	Minor NC if below target, with a documented renewal plan.
4	Quartile of the journals in which company-sponsored studies are published.	All publications in the two-year period in Q1 or Q2 journals (SCImago); assessment methodology agreed with SGS.	Publications in Q3 or Q4 journals; assessment methodology not agreed with SGS.	Minor NC if publications are below Q2, with documented scientific justification.
5	No. of new scientific studies initiated in the audit year with sponsorship on priority topics of the Nutrition Pillar.	≥ 1 new study initiated during the year; documented research protocol or funding agreement; definition of 'study initiated' agreed with SGS.	No new study initiated; no agreements in the start-up phase; definition not agreed with SGS.	Minor NC with a study initiation plan for the following year.