International Policy

Fish & Seafood Sourcing

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1. INTRODUCTION

Fish stocks around the world are under increasing strain from overfishing while the impacts of fish farms on biodiversity and animal welfare are increasingly being discussed. When sourcing fish and seafood for own-label products, ALDI Nord is committed to the principles of responsibility and sustainability. The Group aims to continuously increase the proportion of products from responsible sources in its fish and seafood range.

ALDI Nord takes into account environmental and social sustainability criteria as well as animal welfare aspects along the supply chain - from the purchasing of raw materials to the production process and distribution.

2. THE GROUP'S APPROACH

- **Scope**

This International Fish & Seafood Sourcing Policy is the foundation for the purchase and processing of all own-brand products in the area of fish and seafood products sold by the ALDI Nord Group. This includes all foodstuffs containing more than five per cent fish and seafood (e.g. pizza, salads and spreads).
The International Fish & Seafood Sourcing Policy is a binding framework for the ALDI Nord Group and its business partners. It is subject to ongoing updates and consistent review. Its validity ends with the publication of a more up-to-date version on our website.

- **Global Goals**

ALDI Nord supports the United Nations Sustainable Development Goals (SDGs) and wants to contribute to achieving them. As part of the materiality process, ALDI Nord continuously evaluates its work based on the SDGs.

In the area of fish and seafood products, the efforts are focused on creating positive impact in several areas, including ensuring life in water (SDG 14), working together on common goals (SDG 17), addressing hunger and food security (SDG 2), promoting decent work and economic growth (SDG 8), and managing consumption and production responsibly (SDG 12).



3. THE GROUP'S COMMITMENT

As an internationally active retail company, ALDI Nord exerts its influence on the supply chain through product-specific purchasing policies, among other things. With the International Fish & Seafood Sourcing Policy, ALDI Nord supports measures that counteract the increasing threat to fish stocks in the world's oceans, protect ecosystems in marine and inland waters, promote animal welfare and improve working conditions in the fishing industry.

The Group's Goals

- **Responsible Sourcing:** ALDI Nord is committed to source seafood products from responsible fishing and aquaculture practices, ensuring the long-term health of marine ecosystems and the preservation of biodiversity. ALDI Nord aims to achieve this by working with suppliers, NGOs, recognised standards and improvement programs.

- **Biodiversity:** ALDI Nord strives to minimise bycatch in wild-catch fisheries, working with partners to implement responsible fishing techniques and equipment to protect non-target species. ALDI Nord actively engages in efforts to protect and conserve vulnerable marine habitats, biodiversity and species, collaborating with organisations dedicated to marine conservation and aquaculture.

- **Human Rights:** In line with the Group's overarching human rights due diligence process, ALDI Nord strives to continuously assess risks and improve conditions for the people and communities in the Group's supply chains. ALDI Nord has defined zero-tolerances for production sites and aims to eradicate practices such as child and forced labour from the supply chains.

- **Transparency and Traceability:** ALDI Nord is committed to achieve supply chain traceability, from source to shelf, and to provide consumers with transparent information about fish and seafood products they purchase.

4. THE GROUP'S IMPLEMENTATION

I. Responsible Sourcing

ALDI Nord strives to achieve its goals by implementing the following criteria and measures across all categories of fish and seafood articles. All ALDI Nord countries have agreed on the goals described above. ALDI Nord uses those as a benchmark in reporting and purchasing as well as a requirement for internationally bought articles. Due to the differences in ALDI Nord markets across Europe, the timelines to meeting the targets are set independently for each country and can vary. Current timelines and requirements are available to the suppliers of the ALDI Nord Group via the International Catalogue of Requirements (ICOR).

Risk assessment and transparency with Sustainable Fisheries Partnership (SFP) Seafood Metrics:
ALDI Nord suppliers are obliged to report on the sources of the sold articles on the SFP Metrics platform each quarter. Doing so, ALDI Nord regularly monitors certification rates as well as raw material sources' profiles and their associated risks. This data is embedded into purchasing decisions in all markets.

Responsible sourced aquaculture:

- Certification with either:
  - Aquaculture Stewardship Council (ASC)
  - GLOBALG.A.P.
  - Organic
  - Best Aquaculture Practices (BAP) with minimum 4 Stars (only in Portugal, Poland and Spain)

OR

- Where certification according to these standards is not yet possible, Aquaculture Improvement Projects (AIP) will also be considered provided they are listed on a relevant public website (e.g. www.aipdirectory.org) and have a public workplan in place. Exceptions must be authorised by the responsible CR department on a case by case basis after consultation with the NGO partners.

Responsible sourced wild-caught fish and seafood:

- Certification with either:
  - Marine Stewardship Council (MSC)
  - Other Global Seafood Sustainability Initiative (GSSI) recognised standards

OR

- Where certification according to these standards is not yet possible, Fishery Improvement Projects (FIP) with proven A, B or C-rated progress and registered with fisheryprogress.org or fisheries in the MSC Improvement Program are accepted. For herring and mackerel from FAO27, ALDI Nord accepts raw material sourced from the FIP North Atlantic Pelagic Advocacy Group (NAPA) where ALDI Nord is actively engaged as member.

OR

- Where certification and sourcing from FIPs are not yet possible, ALDI Nord implements a risk assessment based on fishery scores on fishsource.org. On this platform, fisheries are rated for their management quality and stock health. Exceptions granted based on this assessment are discussed between all parties during the tender process.

Additional requirements for tuna:
For articles containing tuna, the supplier and / or processor is required to be a member of the International Seafood Sustainability Association (ISSA) and / or the vessel is required to be registered on the Proactive Vessel Register (PVR) as long as the fishery does not have MSC certification.

Furthermore, to actively shape discussions in Regional Fishery Management Organizations (RFMOs) and to foster sustainability in tuna fisheries, tuna suppliers are required to advocate and engage with the RFMO delegates.

II. Biodiversity and Animal Welfare

Together with its partners, ALDI Nord is working to reduce the impact on endangered, threatened and protected species (ETP). ALDI Nord does not sell fish and seafood species that are classified as endangered, protected or temporarily protected on international species protection lists. The Group excludes all fish and seafood species listed in CITES Appendices I and II.

Further species may be individually assessed and excluded based upon various parameters such as fishing area, fishing method or gear. Purchasing decisions are reviewed regularly, as the fish stocks of individual species as well as associated independent risk assessment are also constantly changing.

Additionally, raw material sourced from illegal, unregulated and unreported fisheries (IUU Fishing) is banned. ALDI Nord expects its suppliers and their partners in the supply chain to take precautionary measures as well as continuously verify the sources of their raw material.

Through the memberships in the Global Tuna Alliance and SFP, ALDI Nord advocates for the implementation of effective harvest strategies in order to increase environmental sustainability, enhance observer coverage and safety, and implement measures against IUU in fisheries, at RMFO and port-state level.

In the area of animal welfare, ALDI Nord is committed to further advance the level of animal welfare in the production of its goods in the defined area of application, beyond the legislative level. The health and well-being of the animals have a high priority for ALDI Nord, stunning and slaughter as well as animal feed being the main focuses. In this context, constant exchange with the ALDI Nord suppliers and at least an annual exchange with animal welfare-oriented stakeholders, such as certifications, are key elements to keep an eye on current developments.

ALDI Nord is participating in an industry-led research project to assess the effectiveness of electrical stunning and other potentially higher welfare methods for warm water shrimp. This underlines our clear commitment to supporting progress in this area through feasible, industry-wide solutions.

This project will conclude in 2028, and from this date ALDI will start transitioning to electrical stunning or other measures confirmed by the study for its own brand warm water shrimp, with the aim of completion by 2035. ALDI Nord is committed to transparently report annually on the implementation status of pre-slaughter stunning methods from 2028 onwards.

For the successful implementation, two factors are considered critical from our side: first, the scientific confirmation that electric stunning is both improving animal welfare and considered industry-wide applicable. Second, the embedding of this transformation into certification standards which allows independent third-party verification of company commitments.

We acknowledge that eyestalk ablation in warm-water shrimp farming raises animal welfare concerns and are working with the certification standards to phase out this practice. This means a phase out until 2029 for whiteleg shrimp (Penaeus vannamei) and 2030 for giant tiger prawn (Penaeus monodon), respectively.

III. Human Rights

Due Diligence Policy and Risk-analysis

ALDI Nord has developed a due diligence approach governing the policies, requirements, and processes affecting human rights and the environment in its supply chains. This also includes the continuous assessment of the actual and potential impact of the Group's actions with regard to human and environmental rights aspects along diverse supply chains. This process includes both regular risk analysis for ALDI Nord supply chains as a whole, ad hoc risk analysis where needed, as well as impact assessments relevant to specific products and components, coming from different origins or supply chains. Such a Human Rights Impact Assessment has been conducted for wild-caught fish and seafood, focusing on the ALDI Nord tuna supply chain.

The ALDI Nord risk analysis has identified the following human rights risks for the fish and seafood supply chain and has accordingly integrated them into its policies and management systems:

- Gender related issues including discrimination
- Forced Labour
- Child Labour
- Workers' rights
- Occupational Health and Safety

Third-party audits, Corporate Responsibility Supplier Evaluation (CRSE) and ALDI Sustainability Assessment (ASA)

As part of the ALDI Nord social compliance program, all suppliers of selected food product groups, including main fish and seafood products, that are produced in the "risk countries" published by amfori must be members of "amfori BSCI" (Business Social Compliance Initiative) or similar initiatives. Suppliers must ensure that the production facilities located in these risk countries are audited for social compliance by independent third parties in accordance with their chosen initiative.

One of the ALDI Nord targets is to embed sustainability criteria into the purchasing decisions. Thus, ALDI Nord has developed its Corporate Responsibility Supplier Evaluation (CRSE) which is introduced to the suppliers in several stages. The aim is to evaluate the ability of ALDI Nord suppliers to implement CR requirements in their supply chain and manage risks accordingly. The suppliers are rated according to key criteria such as: CR-organisation in the company and their processes, their relationship and support for production sites and their due diligence regarding human rights and environmental risks.

To assess how suppliers are able to control and influence working conditions in sourcing countries, ALDI Sustainability Assessments (ASA) are embedded into the CRSE. Supported by third parties, colleagues assess the sustainability standards of the production sites further to the required social compliance audits named above. ASAs include two modules: overarching human rights and social standards as well as a seafood specific module that focuses on traceability of the product. This allows ALDI Nord to specifically assess the fulfilment of ALDI Nord requirements and enables to determine risks and further measures needed.

IV. Transparency and Traceability

In order to achieve supply chain traceability, ALDI Nord is working together with suppliers and partners such as the above-named Metrics platform. Metrics allows ALDI Nord to reach transparency up to fishery level and is used across all fish and seafood products and across markets. ALDI Nord aims to join the Ocean Disclosure Project based on the data collected in Metrics to publicly report on sourcing data and demonstrate our commitment.
In addition the ALDI Nord requirements include the provision of additional data such as the exact catch period, the catching vessel and the port of landing on request.
Suppliers must be able to verify and disclose the entire value chain of a product at any time by means of the article identification (lot or batch number in connection with the respective best-before date).
To verify traceability at production facility level, ALDI Nord has developed a seafood specific module applied in the ALDI Sustainability Assessments (ASA). Suppliers and production facilities are required to grant access to ALDI Nord staff at any time in order for ALDI Nord to implement ASAs.

5. RESPONSIBILITIES AND CONTROLS

ALDI Nord is committed to regular reviews of its objectives in the area of sustainable purchasing of fish and seafood and will formulate further objectives and measures if necessary. To this end, ALDI Nord is in constant exchange with external partners such as NGOs, representatives from the scientific community and other stakeholder groups.

The present International Fish & Seafood Sourcing Policy and the objectives formulated therein are binding for the procurement departments of ALDI Nord when carrying out the tendering and purchasing processes.

ALDI Nord has informed its suppliers of own-brand articles with fish and seafood components about the content and objectives of the International Fish & Seafood Sourcing Policy. The suppliers of articles within the scope contractually agree to comply with these requirements when placing the order. ALDI Nord expects that its suppliers have developed guidelines for the sustainable procurement of fish and seafood products and set up a management system for the continuous monitoring of the standards. ALDI Nord reserves the right to have random checks of product specifications, production facilities and traceability carried out by independent third parties. Non-compliance with the requirements will be penalised with a warning or termination, depending on the severity of the breach. A contractual penalty is possible depending on the offence. In principle, ALDI Nord wants to work together with the suppliers to improve itself and continue to improve its partners in the supply chain.

In achieving its corporate goals, ALDI Nord has always relied on close and reliable cooperation with its suppliers. The Group shares responsibility for the conservation of natural resources with its business partners and therefore also work together to fulfil the objectives formulated in this International Fish & Seafood Sourcing Policy. ALDI Nord welcomes its suppliers promoting individual sustainability projects in fisheries or aquaculture and providing information on the measures they have taken and current developments.

The management and other responsible persons at ALDI Nord are regularly informed about the current status of implementation.

6. PARTNERS AND STANDARDS

Marine Stewardship Council (MSC)

We've partnered with the Marine Stewardship Council (MSC), a global non-profit organisation working to end overfishing, to offer seafood that is certified to their rigorous standard for environmentally sustainable fishing practices. The MSC has spent nearly 30 years working with scientists, fishers, and seafood companies to develop standards that protect ocean ecosystems and fish stocks. Fishing operations that have achieved MSC certification have been independently assessed and are regularly audited by third-party certification bodies. When you see the MSC blue label on our seafood, consumers can be confident it comes from a well-managed fishery working to reduce impact on the ocean. MSC certified seafood is an important part of our commitment to more responsible sourcing.
What The Blue MSC Label Means For You | Marine Stewardship Council

EU organic

All fish products and seafood bearing the organic label have been produced and inspected in accordance with EU legislation. Among other things, the organic seal stands for controlled water quality, consideration of the natural habitat and certified organic feed.

Aquaculture Stewardship Council (ASC)

Aquaculture Stewardship Council (ASC), an independent non-profit organisation, is driving the improvement of environmental and social practices in seafood farming through its leading, third-party assured certification programme.

ASC certification delivers measurable impact in aquaculture through science-based requirements—developed and revised through multi-stake-holder processes—covering biodiversity, animal welfare, greenhouse gas emissions, feed ingredient sourcing and human rights, all independently verified.

The ASC sustainability label on products provides proof that the seafood originates from farms certified to the robust ASC environmental and social standard, enabling credible substantiation of sourcing claims and making it the most globally recognised and trusted label for farmed seafood.
www.asc-aqua.org

GLOBALG.A.P

The GGN label stands for certified, responsible farming and transparency. Found on farmed seafood, fruit and vegetables, flowers, and plants, the cross-category label offers consumers a quick and consistent way to recognize products that align with their values.

For farmed seafood, the GGN label is applicable to a variety of aquatic species – from salmon to seaweed. It's available in stores on both packaged products and at the fresh fish counter. Labeled products come from production processes that are independently certified to GLOBALG.A.P. standards which aim to promote responsible aquaculture practices. These standards are developed with value chain stakeholders worldwide and set robust criteria on food safety, animal health and welfare, workers' health, safety, and welfare, the environment and biodiversity, and supply chain transparency.
GLOBALG.A.P. | Smart farm assurance solutions

Sustainable Fisheries Partnership

Sustainable Fisheries Partnership (SFP) is a US-registered non-profit founded in 2006 that operates globally.

SFP's VISION is one healthy marine and aquatic ecosystems, where 100 percent of the world's seafood is responsibly sourced and produced.

SFP's MISSION is to engage seafood supply chains globally to rebuild depleted fish stocks, reduce the environmental impacts of fishing and fish farming, and ensure sustained economic opportunities for fishing communities worldwide.

Rather than advocating for boycotts or sourcing changes, SFP asks partners to stay engaged and help fix problems on the ground. By leveraging the purchasing power of retailers, seafood buyers, and supply chains, the organisation brings industry, fishers, NGOs, governments, and scientists together to deliver collaborative solutions that improve fisheries and aquaculture while benefiting nature, people, and business.
Sustainable Fisheries Partnership

Global Tuna Alliance

The Global Tuna Alliance (GTA) is an innovative coalition of retailers and supply chain companies united in driving environmentally sustainable and socially responsible tuna fisheries. GTA works collaboratively across the industry and with key stakeholders to ensure that tuna stocks are managed effectively, advocating for improvements in fishing practices and traceability. GTA's commitment to preserving marine ecosystems and promoting fair labour practices is unwavering. GTA partners with ALDI Nord, sharing a mutual dedication to sustainable sourcing and a responsible supply chain.
Home - Global Tuna Alliance

Best Aquaculture Practices

Best Aquaculture Practices (or "BAP") is a third-party aquaculture certification programme developed by the Global Seafood Alliance, an international, non-profit organisation headquartered in Portsmouth, N.H., USA, dedicated to advancing environmentally and socially responsible seafood practices through education, advocacy and third-party certification. The BAP program addresses the four key areas of responsible seafood; environmental, social, food safety and animal health and welfare, across the entire production chain including the processing plant, farm, hatchery and feed mill.
Best Aquaculture Practices

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