

The Culimer Group Code of conduct



Introduction

As the world population keeps growing, the importance of and demand for fish for human consumption is increasing. Over-fishing, wrong fishing techniques, illegal catch and pollution however currently threaten many aquatic species and ecosystems. Growing public expectations regarding the role of our business, have led to an increasing demand for socially responsible behaviour of distributors and their business partners, along the whole sourcing chain. In order to meet and/or exceed the public expectations while remaining successful, the Culimer Group recognizes the need for it self and its partners to be socially responsible in their business. Beside the ongoing engagement of the Culimer Group in different sustainable sourcing projects, the Culimer Group has adopted this Code of Conduct.

The Culimer Group Code of Conduct sets out principles and standards for social responsibility of the Culimer Group and its business partners. These practices are aimed at ensuring the conservation of biodiversity, management and development of living aquatic species (hereafter called fish) resources. The Culimer Group will participate and contribute to programs that will identify and correct unacceptable conditions and ensure it continues to operate in an ecologically sustainable manner.

Vision

The Culimer Group and its business partners seek to provide high quality and safe fish products to the consumers with respect for social responsibility, employee's welfare, and protection of environment and ecosystems, while striving for economic viability and competitive power.

Scope

The Culimer Group Code of Conduct will have general application to the Culimer Group and its business partners in the whole supply chain covering the wild-catch fishing sector, and the aquaculture.

The Culimer Group is aware that this code as such remains a guideline, except where parts of the code refer to legislation. The business partners of the Culimer Group have their own responsibility to implement, as far as it is reasonably possible, the code in an effective way and use the code to make binding clauses as part of the buying conditions.

The Culimer Group may review and revise this Code following new insights based on practical experience and sound scientific evidence.

THE CULIMER GROUP CODE OF CONDUCT

1. General principles

Underlying this Code of Conduct are general principles applying to the whole supply chain of the Culimer Group. The Culimer Group and its business partners, as far as it is reasonably possible:

- Will comply with all applicable laws and regulations in the country of origin as well as in the countries of destination of the fish products;
- Organize their supply chain with business partners who commit themselves to work in accordance to the Culimer Group Code of Conduct or practice in compliance with internationally recognized standards (EurepGAP, FAO Code of Conduct for Responsible Fisheries, International Principles for Responsible Shrimp Farming, MSC or other Codes of Conduct);
- Will collect objective evidence that their products are sourced and produced according to practices which are in line with the Culimer Group Code of Conduct;
- Will contribute to transparency and open communication regarding the supply chain and characteristics of fish products;
- Will actively promote the use of certified sustainable species as an on-going process to ensure the optimal use of these resources;

2. Objectives

The objectives of the Code are to help the Culimer Group and its business partners in addressing the following issues:

- Quality and Food Safety
- Transparency
- Environment
- Fishing practices
- Aquaculture practices
- Social and ethical practices.

a. Quality and Food Safety

The Culimer Group ensures that:

- A complete HACCP analysis is conducted and a HACCP plan is implemented by every supplier;
- Verification measurements are in place to guarantee that the fish products (-ingredients) are safe and comply with applicable legislation;
- Recall systems are in place when the safety of the products is at stake;

b. Transparency

The Culimer Group and its business partners will deploy a policy of openness and endeavour for a traceability scheme from farm/boat to the point of sale. In that respect, the Culimer Group and its business partners, as far as it is reasonably possible, care that:

- All fish products comply with legislation. The origin, traceability codes, the correct product name of the fish, handling and storage instructions are mentioned on the packaging;
- Only fish products proved to be in compliance with all applicable (fishery) conservation law and regulations are marketed;

c. Environment

The Culimer Group strongly encourages the use of environmentally sound methods in production, transportation and storage of fish products by facilitating the development and transfer of appropriate technologies.

The Culimer Group and its business partners are aware that certain fishing and aquaculture practices may result in irreversible ecosystem degradation. Therefore, the Culimer Group and its business partners, as far as it is reasonably possible, care that:

- All business activities are designed and constructed in ways that minimize environmental damage and are in compliance with local legislation;
- Good aquaculture and fishing practices are encouraged in support of practical and cost effective strategies to ensure that relevant environmental performance standards are monitored and met;
- Appropriate incentives for responsible environmental performance are promoted and sanctions for non-compliance are advocated
- Initiatives to minimize emissions, sediments and waste and all discards associated with aquaculture, fishing, harvesting, processing, storing and transporting practices are encouraged.

- If possible, certificates, for example Eurepgap, ISO 14000 or similar, are available;
- Where no certification is in place, other records of inspection or assessment are encouraged.

d. Fishing practices

The Culimer Group and its business partners, as far as it is reasonably possible, care that:

- No fish from any illegal source(s) or fished over legal quota is traded within its supply chain;
- If possible, certificates of MSC or similar, as a result of independent inspections or audits are available;
- Where no certification is in place, other records of inspection or assessment are encouraged;
- Conservation and management measures must be in place to ensure the sustainability of fish resources at optimal levels;
- There is active support for the conservation of essential fish ecosystems and the rehabilitation of fish populations and ecosystems;
- Initiatives for more selective fishing gear and methods are promoted, including those that reduce unwanted by-catch and discards
- The use of new technologies, methods and applications that can contribute to minimizing the loss of fishing and the ghost fishing effects of lost or abandoned fishing gear is encouraged;
- All partners in the chain have access to information on new developments and requirements (Legislation);

e. Aquaculture

Where possible, the Culimer Group and its business partners stimulate good aquaculture practices. All fish should be cultured according to FAO or other available related codes. Special care will be taken for the following points:

- Fish health and welfare are looked after and monitored using carefully planned measures (regarding density, aeration, feeding, water monitoring, quarantine area and time, treatment, vaccination, parasite control, etc.) to make sure that fish is properly treated and medicine used is in accordance with the veterinarian prescription;
- No GMO fish or fish products are traded in the whole supply chain;
- All chemicals used must be in the approved lists by competent authorities in production and consumption countries;
- All chemicals are subjected to a strict controlling mechanism in order to assure the fish welfare, quality and safety. The strict control of chemical use needs to take into account the issues like workers health and safety as well as environmental protection;

- Fish feed is used in accordance with legislation and regulations of the countries of origin as well as importing countries;
- Water is regularly monitored to make sure that it is not contaminated and untreated water is not discharged to the neighbouring communities;
- If possible, Eurepgap certificates or similar, as a result of independent inspections or audits are available;
- Where no certification is in place, other records of inspections or assessment are encouraged.

f. Social and ethical practices

The Culimer Group will not knowingly conduct trade with companies which do not respect ethical, social, environmental, financial and humanitarian responsibilities. Therefore, the Culimer Group, as far as it is reasonably possible, recommend that their business partners respect the following:

- All business partners in the fish supply chain provide a safe and healthy working environment to their employees and workers. The national and local legislation in this regards must be observed;
- Employees and workers throughout the whole supply chain are adequately trained in order to perform their tasks as expected and in line with this code of conduct;
- If possible, certificates of SA 8000 or equal, as a result from an independent inspection or audit are available;
- Where no certification is in place, other records of inspection or assessment are encouraged;
- No forced labour is used in the whole chain (ILO Convention 29 and 105);
- The rights of employees and workers to freely join any labour organizations of their choice (ILO Conventions 87 and 98) are respected;
- Child labour is prohibited in the whole chain (ILO Conventions 138 and 182);
- No discrimination is tolerated in the fish supply chain (ILO Convention 111);
- Contract arrangements in the fish supply chain are mutually fair and transparent;
- Local laws and regulations on workers' wages and benefits are adhered to.