

ALDI US Seafood Buying Policy

Our Commitment

As stated in our Corporate Responsibility Policy, ALDI US is committed to the principle of sustainability when procuring seafood and fish products. As a leading discount grocery retailer, we recognize the influence we have in the seafood industry to implement positive change. While we strive to provide our customers with the highest quality products at the lowest possible prices, we have a responsibility to sell seafood in an ethical and responsible manner.

Our seafood buying policy applies to all frozen, chilled, shelf-stable seafood and products with fish/seafood as an ingredient. It is the responsibility of ALDI Buying Directors to ensure that products adhere to our seafood policy.

Key decision-makers and ALDI US Management support and expect the sustainable seafood buying policy to be fully integrated into our operations. Additionally, internal and external experts have advised and supported our seafood buying policy. This policy is reviewed on an annual basis and will be revised if necessary. This is the only way to ensure the goal of sourcing sustainable seafood can be achieved in the long term.

Although our responsible seafood buying policy affirms our commitment with our suppliers to sustainably source seafood products, we expect our policy to develop and expand over time. We aspire to responsibly source seafood by focusing on the following aspects:

1. Responsibly sourced product range
 2. Responsible Sourcing Commitment
 3. Social compliance
 4. Product Labelling
 5. Product Testing
 6. Traceability
 7. Cooperation with partners
 8. Product range evaluations
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1. Responsibly Sourced Product Range

Wild-Caught Fish & Seafood

The following principles exemplify qualities and best practices of sustainable wild fisheries:

- Exclude illegal caught fish
- Review sourcing of endangered fish species in accordance with the IUCN Redlist of Threatened or Endangered Species (Vulnerable, Endangered, Critically Endangered)
- Exclude the use of especially critical catchment methods (e.g. dynamite, poison)
- Avoid fish stocks from critical catchment areas
- Reduce by-catch
- Minimize impact on the ecosystem
- Maintain abundant, well-managed fish populations
- Improve traceability throughout the entire supply chain
- Comply with minimum social standards on all levels of the supply chain (i.e. from the ship/farm to the processor to the store)

Farmed Fish & Seafood

The following principles exemplify qualities and best practices of sustainable farmed seafood:

- Abide by strict ecological guidelines for processing
- Promote fish health and welfare
- Exclude genetically modified organisms
- Actively manage and effective feces, waste and water management plan as part of an environmental management system
- Reduce the environmental impact on the (surrounding) flora and fauna
- Keep fish in a species-appropriate environment and maintain a strong fish population
- Improve traceability throughout the entire supply chain
- Comply with minimum social standards on all levels of the supply chain (i.e. from the ship to the processor to the store)

ALDI US aspires to source responsible seafood from wild fisheries and farmed seafood by abiding by the following principles:

- Sourcing only from suppliers that share our commitment to sustainability and transparency
 - Refusing to source from any fishery and/or vessel found to have contributed to Illegal, Unreported and Unregulated (IUU) Fishing.
 - Preferably sourcing seafood products certified according to the Marine Stewardship Council (MSC), Best Aquaculture Practice (BAP), or Aquaculture Stewardship Council (ASC) standards
 - Increasing the number of seafood products that come from sustainable sources and decreasing the number of seafood products that does not meet ALDI US criteria as responsibly sourced. ALDI US strives to work with its suppliers to improve any areas of concern or obtain the necessary data for data deficient fisheries
 - Encouraging fisheries and aquacultures to participate in credible Fishery Improvement Projects (FIP) and Aquaculture Improvement Projects (AIP) and continuously improve within a reasonable timeframe
 - Conducting quarterly reviews of our seafood range
 - Conducting a comprehensive annual review of our seafood range
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2. Responsible Sourcing Commitment

Fresh, frozen and shelf-stable fish and seafood products must meet the following requirements.

Fresh, Frozen and Shelf-Stable Products

All fresh, frozen and shelf-stable fish and seafood products must comply with the below criteria:

- Third-party certified by a trusted independent certifications schemes (MSC, ASC, BAP 4-Stars, Organic, GlobalG.A.P., or other GSSI-recognized certification schemes)
- Fishery must be in a Fishery Improvement Project (FIP) or Aquaculture Improvement Project (AIP, iBAP) that can demonstrate progress with a rating of A, B or C on fisheryprogress.org

Tuna

All tuna suppliers must have active membership in the International Seafood Sustainability Foundation (ISSF) and provide a copy (upon request) of their annual ISSF Compliance Audit Report to ALDI US, or source from ISSF production facilities or suppliers. Suppliers are not allowed to source from vessels that allow transshipment at sea without observer coverage or vessels caught with Illegal, Unregulated and Unreported (IUU) fishing based off of updated IUU lists published by the Regional Fishery Management Organizations (RFMO).

ALDI US will only consider tuna products to be responsibly sourced, if at least one of the following criteria is fulfilled:

- It is certified by the Marine Stewardship Council (MSC), or
- The fishery is involved in a Fishery Improvement Project (FIP) with a progress rating of A, B, or C on fisheryprogress.org
- The fishery must be Sustainable Fisheries Partnership yellow or green rated with ISSF membership and fishing vessels registered on the ProActive Vessel Register (PVR)

Preferential sourcing will be given to tuna suppliers that source from:

- Purse seines and longline fishing vessels registered to the PVR
- Purse seine fishing vessels with tuna caught free of Fishing Aggregate Devices (FAD Free or Free School)
- Longline fishing vessels utilizing best practices to mitigate by-catch, such as circle hooks and mono-filament lines
- Pole & line fisheries

Fish as an Ingredient

All products containing fish and seafood ingredients (excluding sauces/dressings, fish extract, non-food and pet food products) must comply with one of the following requirements:

- Third-party certified as sustainable by trusted independent certification schemes (MSC, ASC, BAP 4-stars, Organic, GlobalG.A.P., or other GSSI-recognized certification schemes)
- The fishery must be Sustainable Fisheries Partnership yellow or green rated with ISSF membership and fishing vessels registered on the ProActive Vessel Register (PVR) - Tuna items only
- The fishery must be actively working toward certification or in a Fishery Improvement Project (FIP) or Aquaculture Improvement Project (AIP, iBAP) that can demonstrate progress with a rating of A, B, or C on fisheryprogress.org

3. Social Compliance

ALDI US is committed to human rights and fair labor practices throughout our supply chain. It is a matter of great importance that production of goods for our business is carried out under conditions which respect these rights. Suppliers of all ALDI SOUTH Group countries are required to follow the ALDI Business Partner Sustainability Standards at all stages of the supply chain.

Social Monitoring Program

Our Social Monitoring Program requires suppliers to provide third-party audit reports at final processing facilities to demonstrate they are upholding our Social Standards in Production. If these audits raise any concerns, we require a Corrective Action Plan (CAP) to be developed so that steps can be taken to improve working conditions.

ALDI Sustainability Assessment (ASA)

We supplement third-party social monitoring audits with our own ALDI Sustainability Assessments (ASAs). These on-site visits are conducted in production facilities of select high-risk commodity groups by ALDI employees, together with external auditors and business partner representatives.

Corporate Responsibility Supplier Evaluation (CRSE)

Our CRSE is a comparable and transparent evaluation, which focuses on our business partners' social and environmental compliance management systems and their farm or production facilities' corporate responsibility performance. The CRSE supports long-term relationships with business partners who demonstrate a strong commitment to continuous improvement by allocating the majority of our buying volume to these suppliers.

4. Product Labelling

All fresh, frozen and shelf-stable private label seafood products sold in our stores include the following label elements to enable our customers to make informed decisions:

- Common name
- Scientific (Latin) name
- Production method (wild fishery or farmed seafood)
- FAO catchment area (wild fishery) or country of origin (farmed seafood)

5. Product Testing

ALDI US utilizes accredited third-party testing agencies to ensure the products sourced meet our highest quality seafood standards. Tests conducted may include DNA or species identification analysis, antibiotic and chemical evaluations to identify any unapproved additives, as well as the physical examinations of products. Furthermore, ALDI works with a third-party auditor to randomly audit seafood products once they have shipped to our distribution centers. These quality audits include product testing and supplier analysis.

6. Traceability

ALDI US requests our suppliers assure the traceability of all seafood products delivered to us. In addition to the elements required for labeling a product, ALDI US regularly collects data from seafood suppliers on fishing methods, FIP or AIP participation and other information to support responsible sourcing and continuous improvement. As part of the CRSE ASA program (see above), randomized site visits that include tracing back to the vessel or farm level are performed annually.

7. Cooperation with Partners

In addition to our internal efforts, ALDI US actively partners with the Sustainable Fisheries Partnership (SFP), a non-profit organization whose mission is to engage and support global seafood supply chains in rebuilding depleted fish stocks and reducing the environmental impacts of fishing and fish farming. SFP provides a strategic and technical guidance to seafood suppliers and producers, helps bring them together with like-minded companies in Fishery Improvement Projects (FIPs), and builds consensus

around specific improvements in policies, marine conservation measures, and fishing and fish-farming practices. SFP has a team of researchers and fishery scientists who provide ALDI with information to assess the sustainability of the seafood products we offer and identify any necessary improvements.

ALDI is a member of the Seafood Task Force, a multi-stakeholder initiative seeking to address Illegal, Unreported and Unregulated (IUU) fishing in an effort to address human rights issues and marine conservational problems, which are believed to be closely interlinked in Thailand. The Seafood Task Force uses the combined knowledge and experience of its membership to address complex supply chain issues that cannot be solved individually. The aim is to achieve clean seafood supply chains from vessel to retailer through driving oversight and continuous improvement across people, product, process and policy.

8. Product Range Evaluations

ALDI US partners with SFP to collect and store seafood data and sourcing practices in our supply chain. We review and evaluate the following information to assess sustainability of our fish and seafood products when contracts are being negotiated, throughout the term of the contract, quarterly, and at the end of every calendar year.

- Common and species name
- Geographical location of source fisheries
- Type of fishing gear
- Nationality of the fishery
- Certification to an approved sustainability standard
- Participation in a FIP/AIP and current progress rating
- Management and status of the fishery scores derived from the public FishSource database

The results and findings of this assessment are documented internally. Any products identified as “not responsibly sourced” are reviewed to determine if sustainable alternatives are available. ALDI US updates our [Ocean Disclosure Project page](#) annually, a public facing database that lists all fisheries where ALDI private label products are sourced.

We work closely with our long-term suppliers to integrate the ALDI US Seafood Buying Policy in all procurement decisions. Additionally, we will measure our progress and work closely with our suppliers and partners to ensure improvements are being made in wild fisheries and fish farms.
