



# BENTO SUSTAINABLE SEAFOOD POLICY

This policy sets out our targets, approach, industry commitments, and risk assessment priority areas for responsible and sustainable seafood sourcing at Bento. It applies to all seafood and all Bento brands, in all locations around of the world (unless specified otherwise).

## Our Responsibility

Bento has always been passionate about sourcing the freshest and highest quality sushi and seafood possible, and now, as a leading multi-channel food and restaurant business, it is one of our strategic priorities.

With 90% of the world's fish stocks now being overfished or fully exploited and with seafood making up a significant % of annual spend, we recognize that we have an important role to play in safeguarding the future of our oceans. Healthy marine ecosystems are critically important not only to our business, but to over 3 billion people around the world who depend on the oceans for their primary source of protein. Fishing is also a major source of employment around the world, with 200 million people directly or indirectly employed in fisheries.

And as the world's population and reliance on fish as a source of protein and employment increases, the pressure on our oceans will only be exacerbated. We have a responsibility to use our purchasing power and brand influence to drive positive changes that will help to protect our oceans and ensure that future generations can continue to enjoy seafood in the way we do today.

## Our Sustainable Seafood Targets

- We remain committed to fulfilling our retail brand partners' sustainable sourcing standards and will ensure that our main seafood products, such as salmon, tuna, shrimp, and surimi are sourced both sustainably and ethically.
- Implementation of our Responsible Sourcing Standards Guide with 100% of Tier 1 and Tier 2 suppliers.

*NB: The terms 'responsibly sourced' and 'sustainably sourced' or 'certified' are often used interchangeably to describe seafood that meets certain environmental, social, and ethical standards or certification. Whilst both terms can be used to explain or describe an overarching approach to sourcing, farmed seafood products should only be categorized or identified as being responsibly sourced (the behaviour of the business producing the farmed product is deemed to be responsible), whereas wild caught seafood can be categorized or identified as being responsibly sourced (relating to the behaviour of the fishing business) and/or or sustainably sourced, (relating to the environmental and management status of the fish/fishery).*



## Our Approach

### How we source seafood

Responsibly sourcing seafood is a complex process that involves balancing many (often) competing commercial factors alongside a plethora of interconnected scientific, geographical, sustainability and supplier variables. Understanding the potential risks and impacts of seafood sourcing and acquiring the knowledge needed to make informed and sustainable purchasing decisions requires working closely with trusted suppliers and industry-wide bodies, and the use of best-practice framework initiatives and certifications and ratings schemes.

To guide and simplify our purchasing decisions, for many years we have adopted the “*strive for the best, avoid the worst and improve the rest*” approach to responsible and sustainable seafood sourcing, in line with the [Marine Conservation Societies \(MCS\) Good Fish Guide](#) and [Monterrey Bay Aquarium’s Seafood Watch](#) ratings. To this day, it still forms the basis of our sourcing strategy.

Our overarching approach to seafood sourcing is based on obtaining the necessary information required to enable us to have the confidence to make knowledge-based decisions on the four critical areas of responsible seafood sourcing: good farm and fishery management, traceability and transparency, environmental sustainability, and social responsibility within our supply chains as follows:

- **Farmed seafood:** To only source farmed seafood that is certified as responsibly sourced by ASC, Global Gap, or BAP 4\* (or by another GSSI recognized independent certifying body).
- **Wild caught seafood:** To meet at least one of the stipulations below (in order of preference):
  - Marine Stewardship Council (MSC) certified fishery.
  - Marine Conservation Society (MCS) rating 1-3 or Best Choice or Good Alternative by Monterey Bay Aquarium’s Seafood Watch.
  - Product is from a fishery undergoing formal MSC Pre-Assessment.
  - Product is from a fishery in formally recognized Fishery Improvement Project (FIP) that has existed no longer than 5 years and can demonstrate progress.
  - Product is a species that is not rated at all by the MCS, but sufficient evidence can be provided to verify the products’ sustainability credentials.
  - In exceptional circumstances products with a MCS rating of 4 (Needs Improvement) may be used in the short term, but only if pre agreed with Bento Sustainability Team, to cover an unexpected/unforeseeable supply chain issue and where there is a documented plan to shift to a better alternative at the first opportunity.

To determine if products meet the above-mentioned stipulations, we require that suppliers share information regarding the origin of the products supplied to Bento, the gear type or catch method, and the production methods used therein, to enable farm or fishery to fork supply chain mapping, product specific traceability and transparency, and adherence to relevant industry led Codes of Conduct and Standards.



### **The industry-wide responsible seafood initiatives that we are committed to**

In addition to adopting the above approach to seafood sourcing, we have also committed to supporting and implementing the following industry leading best practice initiatives, frameworks, and goals to improve our overall sustainability performance; to achieve our Responsible Seafood Targets and to ensure we are contributing to the overall raising of standards across the industry.

- To better understand and reduce the risks of modern slavery (forced and child labour) in our supply chain, we will require documentation showing actions that vendors employ to mitigate the use of such labour. This will be required for all Tier 1 and 2 seafood suppliers.
- The Global Dialogue on Seafood Traceability (GDST) Standards (GDST) are the first global, voluntary, industry-led standards for seafood traceability and used by many leading seafood businesses. Moving forward we will be incorporating the standards into our sourcing and risk assessment.

### **Our Minimum Seafood Standards**

Our seafood specific minimum standards and general approach to seafood sourcing are as follows:

- We will not source any seafood products from protected species or species that are listed as critically endangered or vulnerable to extinction according to IUCN red list of threatened species. This includes any species caught as bycatch.
- Suppliers will not knowingly cause, or risk causing, irreparable ecosystem or biodiversity damage.
- Bento will not tolerate any form of Illegal, Unreported or Unregulated (IUU) fishing in its supply chain and Suppliers must take responsibility to carry out due diligence checks and audits accordingly.
- Suppliers must be able to provide documented evidence (including but not limited to valid certifications) to trace their product through their supply chain back to source (either to vessel for wild caught or to farm level for aquaculture) and must provide contact details of all suppliers and intermediary stages upon request.
- Suppliers must provide the species' scientific name, sourcing origin/Flag Nation, FAO sea location, catch/gear/production method, information on social and ethical performance, and valid certificates for any current seafood sustainability standards, as we require this for traceability.
- Suppliers must not source any fish or seafood rated by the Marine Conservation Society (MCS) or Monterey Bay Aquarium Seafood Watch as Fish to Avoid / MCS Rating 5.

### **Responsible Sourcing and Risk Assessment Principles**

The responsible sourcing of seafood revolves around good performance in the following overarching principles. In the section below we set out key elements that feed into our Risk Assessment and decision-making processes.

#### **Fishery and Farm Management Practices**

The existence of responsibly managed fisheries and farms is crucial for the responsible sourcing of seafood. Without strong management practices and processes in place there are no means for any issues of concern to be identified nor addressed. We work with our suppliers to review the existence of good practice management approaches as set out by



our Risk Assessments, the Sustainable Seafood Coalition (SSC) Code of Conduct, the MCS Good Fish Guide Ratings, Monterey Bay Seafood Watch and other industry best practice frameworks as follows:

### **Wild-Caught Products**

- We work with suppliers to ensure the fisheries from which we are sourcing products have the appropriate documentation in place to verify the fish is from a legal source. (e.g. Reviewing documents such as catch certificates, product specification and landing declarations to provide assurance that the source is traceable and legal).

### **Farmed Products**

- We work with suppliers to ensure that appropriate aquaculture standards and best practices are in place across all key production stages, including hatcheries, feed mills, farms, and processing sites. We expect suppliers to have documented processes and controls in place to address the following:
  - Compliance with all required licenses, regulatory controls, and legal requirements.
  - Regular Environmental Impact Assessments (EIA), including site suitability, water source quality, and discharge impact evaluations.
  - Proper design, maintenance, and monitoring of ponds, cages, or tanks to prevent escapes.
  - Adequate water treatment measures for intake and discharge, where necessary.
  - Record-keeping, staff training, and traceability systems to ensure responsible aquaculture practices.

### **Traceability and Transparency**

Traceability and transparency are critical to ensure legal, environmentally sustainable, and socially responsible supply chains. Without precise details of what species of fish we are buying, where it comes from and how it is caught or produced (amongst many other considerations) it is impossible to know if our seafood is responsibly sourced. We require that suppliers have sufficient measures in place to trace fish from fishing vessel or precise farm to its point of sale. Additionally, we commit to being transparent regarding the species, fish sources, stock levels, location, and capture or farming method of the fish we source and making this information publicly available (on request). We also commit to updating and reviewing our policies, risk assessments and products on at least an annual basis.

### **Wild-Caught Products**

- We acknowledge that Illegal, Unreported and Unregulated Fishing (IUU) can be associated with developing nation tuna fisheries and that human trafficking and forced labour has also been identified in the seafood industry more broadly. IUU undermines any attempt of sustainable fisheries management and has huge negative ramifications (financially, environmentally, and socially) in every part of the globe in which it occurs.
- We expect that appropriate measures are in place to avoid and/or combat IUU fishing, and include measures such as approved vessel lists, vessel checks against



IUU blacklists and IUU flag nation card status checks as well as identification and implementation of port state control and enforcement.

### **Farmed Products**

- For farmed fish, this includes providing up-to-date certificates for all stages of production (feed mills, hatchery, farm and processing) and traceability of the marine ingredient components of fish feed back to the source fishery or to the feed processing factory.

### **Wild-Caught Products**

#### **Capture Method**

- Different gear types can have varied impacts depending on their design, where they are used and what they are catching. We recognize that gear variance is why the same species may have different sustainability rankings or eco-certifications, depending on how it was caught. Likewise, different species caught by the same gear type can have different sustainability concerns. We look to work with suppliers to mitigate any negative impacts of fishing gear and to increase fishing selectivity to reduce the incidence of catch of non-target species.
- Where possible we will choose seafood from low impact fisheries that have minimal impact on other species and the marine habitat as identified in the [MCS Gear Leagues Table](#). Where low impact capture methods are not possible, we will work with suppliers to understand how the fishery avoids sensitive habitats, reduces discards and prevents catching vulnerable species such as dolphins, sharks, turtles and birds.

#### **Breeding Season and Minimum Size**

- We recognize that some minimum landing sizes are much greater than the species' length at maturity. We will therefore aim to avoid buying seafood that has not had a chance to breed (below length at maturity) or has been caught during its breeding season, as noted in the MCS Seasonality & Length Guide.

### **Farmed Products**

We require that farmed seafood be certified to a recognized standard to minimize any negative environmental impacts such as habitat disruption or disturbance from the construction and operation of aquaculture facilities, inadequate monitoring and management of chemical use and water pollution, or disease transfer and escape to wild populations.

Our preference is for all our farmed seafood to be produced to one of the following three production standards (in no particular order):

- Aquaculture Stewardship Council (ASC)
- Global Gap (G.A.P)
- Global Aquaculture Alliance Best Aquaculture Practices (GAA BAP 4\*)



## Fish Health, Welfare and Slaughter

- Fish welfare is both a key concern for many consumers and a key indicator of good management practices within the farm system. We are working with our suppliers to understand how we perform in this area at all stages of the animals' life (including assessing the existence and implementation of good practice measures such as health and welfare policies and monitoring, staff welfare training, and species life-stage requirements which cover water quality, stocking density, handling, production and parasite management and slaughter).
- We expect suppliers to avoid using antibiotics prophylactically, for growth promotion, or for any non-health-related purpose. Additionally, we ask that [WHO high-priority antibiotics](#) which are critically important to human health are only used as a last resort.

### Continuous Improvement, Advocacy and Communication

In cases where we identify that sustainability performance should be improved, our preference in the first instance (so long as not relating to any serious sustainability breach) is to actively engage with such supplier, farm, or fishery rather than to immediately cease sourcing from these sources. We will support our suppliers to engage in genuine improvement projects that have a defined goal and timeframe.

The seafood industry is constantly changing. Advances in gear technology, best practices, and management mean that over time, responsibly fished/farmed and sustainable seafood should become more accessible. Through carrying out supplier assessments and policy reviews every year and through adopting the priorities set out in this policy (and those more widely related to it) we aim to achieve our responsible sourcing targets and continuously improve our broader sustainability performance.

We want our customers, consumers, and partners to be able to trust that the seafood they buy from us is responsibly or sustainability sourced and will ensure that effective labelling and communication is implemented to make it easier for people to make the right choices.

We want to encourage greater knowledge and engagement around the importance of sustainable seafood and will be providing training for all our teams, as well as improved communication of our priorities and approach to suppliers, partners, and consumers.

We will also continue to work collaboratively with other businesses and industry bodies to address any systemic issues in the seafood industry that cannot be solved by us alone, using our purchasing and brand power where we can, to help protect the future of our oceans.

*David Jones*

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**Dave Jones: Bento President & CEO**