



## Responsible Sourcing & Animal Welfare Policy

Sykes Seafood is a business that is committed to responsible sourcing within the seafood industry and actively engages with its customers and suppliers to promote best practices.

We are aware of the importance of transparency throughout the entire supply chain and provides adequate resource to ensuring the standards that we set ourselves pertaining to responsible sourcing, animal welfare, human rights and environmental & social governance are upheld.

We actively monitor and report on our progress and highlight potential risks within the supply chain with the overall objective of meeting customer and consumer needs.

This policy has been approved Neil Townend and the board of directors.

Neil Townend

Managing Director

25<sup>th</sup> November 2025

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### 1. Purpose

- 1.1. Sykes Seafood Ltd ("the Company") is committed to the practice of responsible corporate behaviour.
- 1.2. Through its business practices and documented internal policies and procedures the Company seeks to ensure that all species sourced and purchased are done so in a responsible manner that takes into account the appropriate environmental and animal welfare standards that are demanded by its customers.
- 1.3. This policy applies to all species purchased, transported and handled by the Company regardless of geographic location.
  - a) The highest volume of species purchased by the business are (in order of highest to lowest purchased volumes):



- i. Wild caught shrimp (*Pandalus* spp. & *Pleoticus* spp.)
  - ii. Farmed shrimp (*Penaeus* spp.)
  - iii. Wild caught fish (including *Gadus* spp. & *Melanogrammus* spp.)
  - iv. Farmed fish (including *Salmo* spp. & *Dicentrarchus* spp.)
  - v. Other crustaceans excluding shrimp (*Homarus* spp., & *Procambarus* spp.)
  - vi. Molluscs (*Mytilus* spp., *Placopecten* spp., *Zygochlamys* spp., & *Meretrix* spp.)
  - vii. Wild caught cephalopods (including *Loligo* spp., *Illex* spp., *Dosidicus* spp., & *Todarodes* spp.).
- b) The company sources from global supply chain that includes (but not limited to) the following regions:
- i. North Atlantic offshore fisheries
  - ii. South & Southeast Asia most notably Vietnam, India, Thailand & Bangladesh
  - iii. South America most notably Ecuador & Venezuela
  - iv. Europe
  - v. North America
  - vi. China
- 1.4. The Company does not trade in any live species either to other businesses or to consumers.
- 1.5. The Company is committed to the progression of environmental and animal welfare standards within the seafood industry, and all suppliers are expected to demonstrate compliance to this and all other active company policies prior to supply commencing. Where non-compliance is identified, suppliers must submit robust corrective action plans that are time-specific and will ultimately lead to full compliance of the company's requirements.
- 1.6. This policy acknowledges the fact the Company does not engage in any primary processing or related operation – that is the direct capture or raising of species – therefore it must taken into consideration that the business can only provide indirect influence in these areas, primarily though the awarding of business to suppliers that can demonstrate compliance to this policy and other industry good practices.
- 1.7. This policy is non-exhaustive, and all aspects of the Company's business should be considered in the spirit of this policy.
- 1.8. The management and implementation of this policy is the responsibility of Company's Technical and Responsible Business department with ultimate accountability sitting with the Board of Directors.



Training is provided to all employees of the business that have responsibilities to ensure compliance to this policy or anyone who is responsible for engaging with third parties on any aspect set out in this policy. Currently all employees with the company's Technical, Procurement and Commercial departments receive formal in-house training on responsible sourcing, animal welfare (primarily decapod crustacean welfare) & environmental and social governance.

- 1.9. The processes involved in ensuring the criterion in this policy are effectively implemented include the following:
- a) Implementation of a robust vendor assurance and supplier approval system that includes ensuring suppliers and raw materials obtain appropriate accreditation and the requirements of this policy are set out within purchase contracts.
  - b) Supply chain mapping showing transparency through each stage from primary processing to purchasing.
  - c) Physical audits of suppliers and supply chains encompassing animal (including decapod crustacean) welfare, responsible sourcing & environmental and social governance in addition to food safety, quality & legality.
  - d) Participation in various sustainable seafood schemes and example of which is the Sustainable Seafood Coalition (SSC) where we are a signatory to a code of conduct.
  - e) Obtaining appropriate certification for the Company itself through independent audits.
- 1.10. The Company sets measurable objectives and targets against the criteria set out in this policy. These are reviewed annually, and the results used to determine the following year's objectives.
- 1.11. Where this policy states that the supplier must have specific controls in place, the company must obtain supporting evidence to robustly demonstrate compliance to this policy. Where controls are not in place, or non-conformances against this policy are identified, a time-specific corrective action plan to address the non-conformities against this policy must be in place and agreed with the company. It is the responsibility of the of the company's Technical and Procurement departments to work with the supplier in ensuring any action plan is in place prior to any raw materials being purchased.
- 1.12. Where time-specific objectives and targets are stated in this policy, the company carries out physical and remote audits to measure and assess compliance levels.

## 2. Responsible Sourcing

- 2.1. The Company sources seafood species using criterium set out within its Supplier Approval Procedure and



actively works with suppliers to ensure compliance to the standards it sets. To date the company has engaged in programmes – providing both financial and educational support – with suppliers of to actively promote the welfare of decapod crustaceans. Examples include financial contribution and training seminars to studies that explore the removal of eyestalk ablation in broodstock for warm-water shrimp whilst still maintaining optimum yield efficiencies and financial contribution to the commissioning of electrical stunning devices for use at shrimp farms along with the appropriate training in their safe use. All of which are coordinated through working groups involving suppliers, employees within local communities, equipment manufacturers and universities.

- a) An example of such an initiative is promotion on the use of electric stunning within the shrimp farming industry in collaboration with the Shrimp Welfare Project through its [Humane Slaughter Initiative](#). The business has invested into the commissioning of such equipment with our supplier Cofimar (Ecuador) and has provided incentives for its continued use in our supply chain as well as training for safe and continued operation. More details can be found [here](#).

Additionally, the requirements for compliance against this policy is mandated through its inclusion within purchase contracts for all suppliers of all seafood species.

- 2.2. The business is committed to ensuring that the supply chains that it participates within do not include individuals or entities that are included in the UK Sanctions List. The list used for reference by the business can be found here - <https://www.gov.uk/government/publications/the-uk-sanctions-list>
- 2.3. In addition to the above, the company is an active member of the Sustainable Seafood Coalition (SSC) and adopts its Codes of Conduct.
- 2.4. The requirements for sourcing aquaculture species are set out below:
  - a) Direct supplying facilities are to be in possession of Global Food Safety Initiative (GFSI) benchmark certification scheme.
  - b) The Company gives overall preference to sourcing species that are certified to either Best Aquaculture Practice (BAP) 4\* or Aquaculture Stewardship Council (ASC) and, upon request, be able to demonstrate full chain of custody to either of these schemes. Other accreditation may be considered on a case-by-case basis following internal risk assessment.
  - c) In instances where BAP or ASC certification are not available then the Company may consider sourcing from suppliers who are part of an active aquaculture improvement project (AIP). This will be based on internal risk assessment.
  - d) In instances where BAP or ASC certification are not available and there is no active involvement in an AIP then the proposed supplier / supply chain must be audited against a standard devised by the



Company that adopts the fundamental principles of BAP or ASC and a subsequent corrective action plan agreed upon to address any findings of non-compliance.

- e) Where possible, suppliers must be sourcing feed that adheres to at least one of the following criterium:
- i. Marin Trust certified.
  - ii. BAP certified.
  - iii. MSC/ASC certification for seafood of seafood ingredients and deforestation & conversion free assured soya.

2.5. The requirements for sourcing wild caught species are set out below:

- a) Direct supplying facilities are to be in possession of Global Food Safety Initiative (GFSI) benchmark certification scheme.
- b) The Company gives overall preference to sourcing species that are certified to the Marine Stewardship Council (MSC) and, upon request, be able to demonstrate full chain of custody to this scheme.
- c) In instances where MSC certification is not available then the Company may consider sourcing from suppliers who are part of an active fishery improvement project (FIP). This will be based on risk assessment.
- d) In instances where MSC certification is not available and there is no active involvement in a FIP then the proposed supplier must be able to demonstrate that there is an improvement plan in place for the fishery.

2.6. During sourcing, preference will be given to suppliers who can demonstrate that they are committed to driving solutions to the problem of lost, abandoned and otherwise discarded fishing gear (more commonly known as ghost gear).

2.7. As from the 1<sup>st</sup> January 2026, all cold-water shrimp purchased by the company that is caught using trawlers must utilise a sorting grid such as a Nordmøre grid (or equivalent) to support the company's commitment to reduce bycatch in its supply chain. Evidence must be obtained from the supplier prior to commencement of supply.

2.8. All suppliers must be registered on the Sedex platform and be linked to the Company.

2.9. Where suppliers are operational in a country deemed a risk or severe risk by amfori are to have undergone an ethical audit within the last 2 years to a standard deemed appropriate by the Company. The main audit schemes are Sedex SMETA and BSCI amfori although other schemes may be accepted on a case-by-case basis.



### 3. Animal Welfare

- 3.1. The Company recognises the welfare concerns presented by the seafood industry and actively promote practices to mitigate them.
- 3.2. The Company recognises the sentience of decapod crustaceans and cephalopod molluscs (e.g. octopus, squid, cuttlefish) under the scope of the UK legislation, Animal Welfare (Sentience) Act 2022 and, as such, is committed to ensuring their welfare is considered during the sourcing of such species.
- 3.3. The company has recognised the need to work towards the ultimate removal of non-therapeutic mutilation of decapod crustaceans and relevant suppliers must provide details of their operational procedures that specify whether any of the practices listed below are carried out. Where non-therapeutic mutilation is carried out, the supplier must provide time-specific action plans that demonstrate a phasing out of such practices. Failure to provide this will result in no further purchases being made through the supplier.

The company has adopted the requirements set out in the ASC Farm Standard Version 1.01 (Issue Date 1 August 2025) for the timelines for phasing out of the use of eyestalk ablation in female broodstock. Therefore, the company is targeting the complete removal of this practice within its supply base by May 2029 with phased targets leading up to this date. At time of writing, the company primarily purchases *Penaeus Vannamei* so the targets provided here are for this species only.

Examples of non-therapeutic mutilations include alongside permitted tolerances:

a) Eyestalk ablation in shrimp broodstock *Penaeus Vannamei*:

- i. From May 2026 – the supplier must demonstrate that a minimum of 25% of post-larvae have originated from ablation-free broodstock.
- ii. From May 2027 – the supplier must demonstrate that a minimum of 50% of post-larvae have originated from ablation-free broodstock.
- iii. From May 2029 – the supplier must demonstrate that 100% of post-larvae have originated from ablation-free broodstock.

The targets listed above will be assessed on an annual basis through review of purchase contracts detailing the obligations for suppliers that the raw materials purchased originate from ablation-free broodstock and audits are carried out to a schedule determined by risk assessment. This will be the responsibility of the company's Technical and Procurement department with additional resource being available for third party audits where necessary.

b) Declawing – this practice is prohibited, and the company is not to source species that have undergone



this process.

- c) Nicking and/or banding of claws – where used, suppliers must demonstrate the necessity of this process and satisfy the business of the appropriate controls in place that outlines the tolerances for what is excessive along with time-specific actions in place to reduce these practices.

3.4. During sourcing and prior to supply commencing, the company will obtain assurances from suppliers of wild caught species that they have a commitment to reduce the negative effects of any capture method on the welfare of the species and to reduce bycatch. Examples include utilising alternate catch methods to trawling and employing fishing gear that allows for escape if lost or abandoned. Where trawling is used for shrimp, a sorting grid (Nordmøre or equivalent) with a slat spacing of no more than 22mm must be used to prevent bycatch.

Within purchase contracts, the company requires fishing gear to have minimum mesh sizes that are species-specific to reduce bycatch of unwanted smaller species as per the below.

- a) Fishing gear for all wild caught cold-water shrimp must have a minimum mesh size of 40mm
- b) Catch methods for lobsters may only be carried out using pots / creels that have escape hatches and the minimum mesh size for half-mesh nets is 70mm.

3.5. The Company also works to ensure that the appropriate welfare standards are in place during slaughter of all species that are part of the supply chain and, where practical, will support the implementation of alternative methods deemed to be more humane. The suppliers are to be contractually obliged to specify the method of slaughter and/or the use of inhumane practices. The Company will not allow any species purchased to have undergone any of the below practices unless specifically authorised through derogation:

- a) Live and conscious boiling/steaming
- b) Asphyxiation by from deprivation of oxygen or CO2 gassing
- c) Chemical anaesthetics

3.6. Where practical, electrical stunning must be considered as an operational process prior to slaughter, the effects of which must be sufficient, in that it results in instantaneous insensibility to pain and consciousness, and slaughter should be performed immediately thereafter. The effects from the electrical stunning must last until death occurs.

The company requires that all lobster species purchased to have undergone electrical stunning as defined in this clause.

The company requires suppliers of farmed warm-water shrimp to demonstrate plans for the introduction electrical stunning within farms and is targeting to have 50% of warm-water shrimp purchased to have





undergone electrical stunning by 1<sup>st</sup> January 2028. This policy recognises the difficulty in installing such equipment in small farm operations within rural locations therefore a proactive and collaborative approach will be adopted.

There is no current requirement for crayfish to be electrically stunned but the company is actively seeking innovation in this area for this species.

Cold-water shrimp and Argentinian Red shrimp are landed dead therefore there is currently no requirement for electrical stunning for these species.

The targets listed above will be assessed on an annual basis through review of purchase contracts detailing supplier guarantees that the raw materials purchased have undergone electrical and audits are carried out to a schedule determined by risk assessment. This will be the responsibility of the company's Technical and Procurement department with additional resource being available for third party audits where necessary.

3.7. The company is currently investing in projects that aid in the installation and implementation of electrical stunning at shrimp farms and have funded research into boosting productivity in shrimp broodstock that have not been subject to eyestalk ablation.

3.8. The supplier must have in place appropriate controls for holding of species post-capture and during transportation (where applicable) until further processing and/or slaughter or death occurs. The expectation is that the supplier can demonstrate, through risk assessment, that such conditions consider each species' physical, behavioural and physiological needs and can mitigate certain stress factors. Examples can include limiting stocking densities, species-specific crates for holding/transportation, set temperatures, humidity, salinity, etc.

Unless by approved derogation, the company does not permit the live transportation greater than 8 hours for any species.

3.9. The company must actively engage with its customers and promote animal welfare activities within the supply chain. To date, the company has presented on various welfare topics to further awareness for the customer and final consumer on topics such as eyestalk ablation and electrical stunning as a humane slaughter method. Through these engagement programmes, the company's portfolio of warm-water shrimp that has not undergone eyestalk ablation has increased dramatically therefore the intention must be to build on this success further for this topic and others mentioned in this policy. Examples of where the business has engaged with its customers and other stakeholders is through its participation in the Humane Slaughter Initiative – as described in paragraph 2.1.

#### **4. Reporting August 2024 – September 2025**

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#### 4.1. Harvest / Catch Methods

- a) 100% of warm-water shrimp harvested through combination of pond drainage and seine nets.
- b) 100% of cold-water and caught by trawls containing sorting grid with slat spacing of  $\leq 22\text{mm}$ .
- c) 100% of Argentinian Red shrimp caught by trawls.
- d) 100% of lobster caught by pot/creel
- e) 100% of crayfish caught by pot/creel

#### 4.2. Slaughter Methods

- a) 100% of cold-water shrimp are landed dead.
- b) 98.6% of warm-water shrimp are stunned using thermal shock ice slurry with 1.4% being electrically stunned.
- c) 100% of lobster are electrically stunned.
- d) 100% of crayfish are stunned using thermal shock ice slurry prior to cook (kill).

#### 4.3. Transport durations – only lobster and crayfish are transported whilst alive. All other species or either landed dead or kill method is carried out at primary source.

- a) 100% of lobster transport durations  $< 4$  hours.
- b) 75% of crayfish transport durations  $< 8$  hours and 25% transport durations  $< 6$  hours (data is derived from average figures collected using harvest data at each fishery and subsequent receipt at processing facility).

#### 4.4. Eyestalk Ablation in Warm-Water Shrimp Female Broodstock (as per objectives in clause 3.3)

- a) 52.8% of warm-water shrimp purchased by the company that has originated from female broodstock that has not undergone eyestalk ablation.