

Fish Procurement Policy



January 2026

OUR COMMITMENT TO SUSTAINABLE SEAFOOD

We are committed to serving seafood that is sourced responsibly, supports healthy marine ecosystems, and does not contribute to the decline of endangered or vulnerable fish species. Sustainability is a procurement requirement, not an aspiration. This policy applies to all seafood purchased, prepared, and served across our operations. It extends beyond responsible sourcing to encompass a whole-fish, zero-waste philosophy that celebrates the diversity of sustainably available species.

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CORE PROCUREMENT PRINCIPLES

Our seafood purchasing is guided by the following non-negotiable principles:

1 Certified Sustainable Sources Only

We only procure seafood that is certified to a recognised sustainable fishing or aquaculture standard (see section 10). Certification must be current, verifiable, and maintained throughout the supply chain. No seafood will be procured without evidence of valid certification from an internationally recognised body. All menu items, including our best-selling seafood dishes, must meet this requirement.

2 Spawning and Ecological Seasonality

We will not purchase species during their spawning seasons. Our menus are designed around seasonal availability, ensuring fish are purchased when they are most abundant and ecologically appropriate for harvest. Seasonal guidance is cross-referenced against the MCS Good Fish Guide and supplier expertise, and spawning calendars are built into menu planning (see section 12).

3 Healthy, Non-Overfished Stocks

We will not knowingly procure prioritise wild seafood that comes from fisheries where stocks are classified as depleted, overfished, or subject to unsustainable fishing pressure. Stock status is assessed using the MCS Good Fish Guide ratings and, where applicable, scientific assessments from bodies such as the International Council for the Exploration of the Sea (ICES) and equivalent bodies.

4 Low-Impact Fishing Methods

We will not purchase wild seafood caught by methods associated with significant habitat damage, high bycatch levels, or non-selective harvesting. We actively avoid or minimise purchasing seafood caught by methods associated with significant habitat damage, high levels of bycatch, or non-selective harvesting, such as bottom trawling, beam trawling and dredging (in all cases except where certified with robust conditions and rated appropriately by MSC). Preferred methods include line-caught, pot/trap, and hand-gathered fisheries, consistent with MCS Good Fish Guide guidance.

5 Zero Tolerance for Illegal, Unreported and Unregulated (IUU) Fishing

- 5.1 We contractually require all suppliers to ensure that the seafood we buy has not been caught by illegal, unreported, or unregulated (IUU) fishing vessels. This achieved by:

- 5.1.1 maintenance of robust Chain of Custody documentation via MSC certification of all fish suppliers;
- 5.1.2 immediate notification to us if any supplier becomes aware of IUU activity within their supply chain; and
- 5.1.3 the right for us to terminate contracts where IUU fishing is evidenced or suspected.

6 Utilising By-Catch and Reducing Seafood Waste

- 6.1 We regularly serve seafood that might otherwise be wasted, including fish from legal by-catch and underutilised parts of the fish such as bones, skin, and heads. We believe that responsible seafood use extends beyond sourcing to how fish is used once it arrives in our kitchen. Our approach includes:
 - 6.1.1 Incorporating legal by-catch species into our menus where they are sustainably caught and would otherwise go to waste
 - 6.1.2 Using whole fish butchery techniques to maximise yield and minimise waste
 - 6.1.3 Utilising fish bones, heads, and skin in stocks, broths, garnishes, and other culinary preparations
 - 6.1.4 Working with our kitchen team to develop creative dishes that celebrate every part of the fish
 - 6.1.5 Reducing reliance on the most commercially pressured species by embracing the full catch

7 Awareness

- 7.1 Educating our guests and front-of-house team about the sustainability credentials and culinary qualities of alternative species
- 7.2 Reducing menu dependency on the most commercially pressured species
- 7.3 Cross-referencing all new species introductions with the MCS Good Fish Guide to ensure they carry a rating of 1–3 before inclusion on the menu
- 7.4 Using menu language and storytelling to communicate the provenance, catch method, and sustainability credentials of every seafood dish we serve

8 Supplier Standards and Certification Requirements

- 8.1 All seafood is procured exclusively through suppliers holding recognised sustainability certifications: MSC (Marine Stewardship Council) Certified Suppliers – All wild-caught fish and seafood must be sourced from MSC certified fisheries.
- 8.1.1 **MSC (Marine Stewardship Council) Certified Suppliers** – All wild-caught fish and seafood must be sourced from MSC certified fisheries.
- 8.1.2 **ASC (Aquaculture Stewardship Council) Certified Suppliers** – All farmed fish and seafood must be sourced from ASC certified aquaculture operations.
- 8.2 Where MSC or ASC certified alternatives are not available for a specific species, written justification must be provided, and alternative sustainable sourcing options must be explored and documented before any procurement is approved. Limited exceptions may be considered for direct local fisher relationships and legal by-catch utilisation, provided the species carries an MCS rating of 1-3 and full IUU compliance is confirmed.

9 Marine Conservation Society Good Fish Guide

- 9.1 All species served are assessed against the Marine Conservation Society (MCS) Good Fish Guide prior to menu approval. The Guide provides science-based ratings on a scale of 1 (most sustainable) to 5 (avoid).
- 9.2 We will never knowingly serve any species rated 4 or 5 by the MCS Good Fish Guide, including species recognised as endangered or subject to significant sustainability concerns (e.g. wild Atlantic halibut, European eel, and certain shark and skate species).
- 9.3 We actively work to increase the proportion of MCS rated 1 and 2 species on our menu over time and use the Good Fish Guide as a dynamic tool to inform seasonal menu changes and species diversification decisions.

10 Menu Review Process

- 10.1 All seafood menu items are reviewed at least annually against the latest MCS Good Fish Guide ratings.
- 10.2 Reviews are also triggered by supplier changes, seasonal menu updates, stock status changes, or

new guidance from the MCS or certification bodies.

- 10.3 Any species whose MCS rating changes to a 4 or 5 will be immediately removed from the menu.
- 10.4 Seasonal availability windows and spawning calendars are built into menu planning.
- 10.5 All approved seafood species, their MCS ratings, fishing methods, seasonal windows, and sourcing routes are maintained on our Approved Seafood Species List, reviewed and signed off by senior management.

11 Traceability and Supply Chain Requirements

- 11.1 We require all seafood suppliers to provide the following as a condition of contract:
 - 11.1.1 valid and current MSC or ASC certification documentation;
 - 11.1.2 Chain of Custody (CoC) certificates ensuring full traceability from source to point of delivery;
 - 11.1.3 clear species identification using correct scientific and common names on all invoices and delivery documentation;
 - 11.1.4 country of origin and fishing or production method information on request; and
 - 11.1.5 signed IUU compliance declarations.

12 Communications

All relevant kitchen and procurement staff are made aware of this policy. Internal communications will highlight the importance of sustainable seafood sourcing and seasonal requirements. Seafood sustainability credentials are communicated to guests through menu language, descriptions of provenance, and front-of-house engagement.

13 Training and Awareness

- 13.1 Kitchen teams are trained in whole fish butchery and zero-waste fish cookery techniques.
- 13.2 Front-of-house staff are equipped to discuss the provenance, catch method, and sustainability of all seafood dishes with guests.
- 13.3 Staff understand and can articulate why we serve lesser-known species and by-catch as part of our sustainability commitment.
- 13.4 Delivery checks include verification of correct species, seasonality, and certification labelling.
- 13.5 Any concerns regarding species identification, certification validity, or suspected IUU origin are escalated immediately to management.

- 13.6 Educating our guests and front-of-house team about the sustainability credentials and culinary qualities of alternative species
- 13.7 Reducing menu dependency on the most commercially pressured species
- 13.8 Cross-referencing all new species introductions with the MCS Good Fish Guide to ensure they carry a rating of 1–3 before inclusion on the menu
- 13.9 Using menu language and storytelling to communicate the provenance, catch method, and sustainability credentials of every seafood dish we serve

14 Non-Compliance and Continuous Improvement

- 14.1 Any breach of this policy by a supplier, including failure to maintain valid certification, supply of prohibited species, or suspected IUU activity, will be escalated to the General Manager, Food & Beverage. Remedial actions may include suspension of orders, formal corrective action requests, or contract termination in accordance with the Terms of Purchase.
- 14.2 We are committed to continuously raising the standard of our sustainable seafood procurement. This includes the following commitments:
 - 14.2.1 engage proactively with our suppliers to improve sustainability credentials across our supply chain;
 - 14.2.2 work towards increasing the proportion of MCS rated 1 and 2 species on our menus over time;
 - 14.2.3 continue to develop whole-fish and zero-waste cookery practices across our kitchen operation;
 - 14.2.4 expand the range of underutilised and alternative species featured on our menus; and
 - 14.2.5 review this policy annually, or in response to significant changes in seafood sustainability guidance or stock assessments.
- 14.3 This guidance has been developed by the Food & Beverage Senior Management, Executive Chef and Workplace ESG Manager. It is reviewed annually or in response to significant changes in seafood sustainability guidance. Ultimate accountability for compliance with this policy rests with The General Manager – Food & Beverage.
- 14.4 This procurement statement references the following guides and certification bodies:
 - [MCS Good Fish Guide –
www.mcsuk.org/goodfishguide](http://www.mcsuk.org/goodfishguide)
 - [Marine Stewardship Council \(MSC\) –
www.msc.org](http://www.msc.org)
 - [Aquaculture Stewardship Council \(ASC\) –
www.asc-aqua.org](http://www.asc-aqua.org)
 - [International Council for the Exploration of the Sea \(ICES\) –
www.ices.org](http://www.ices.org)

FOR FURTHER INFORMATION, PLEASE CONTACT



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