Bolton Alimentari

Declaration of Commitment "2011-2013 Our Principles, Our Commitment"- Assurance statement

Introduction

The management of Bolton Alimentari commissioned Det Norske Veritas Italia s.r.l ('DNV Business Assurance') to carry out an assurance engagement on the "2011-2013 Our Principles, Our Commitment" declaration of commitment. It was issued by the organization in 2011.

Our responsibility in carrying out the work commissioned was in accordance with the terms of reference that Bolton Alimentari agreed on. The assurance engagement is based on the assumption that the data and information provided is complete, sufficient and authentic. The Bolton Alimentari management is the intended recipient of this assurance statement.

Scope of the activity

The scope of our work includes the following.

- Evaluation of the boundary that Bolton Alimentari agreed on: principles ('Our Principles') and commitments ('Our Commitment') of Bolton Alimentari referred to in the 7 areas covered by the Declaration:
 - Tuna fishing and safeguarding the ecosystem: A Sustainable Commitment
 - Respect for the environment: A Strategic Commitment
 - Respect for people: A Social Commitment
 - Selection of raw materials: A Fundamental Commitment
 - Analysis and controls: A Rigorous Commitment
 - Product traceability: A Transparent Commitment
 - Nutrition and well ness: A Health-Conscious Commitment
- Our evaluation covered statements in the document related to:
 - Principles: in order to assess the consistency and foundation of statements regarding the business values and strategies;
 - Commitments: in order to assess policies and methods implemented by Bolton Alimentari to carry out defined actions.

There were no verifications of the declarations and documents carried out other than the data reported in the declaration of commitment "2011-2013 Our Principles, Our Commitment".

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• Verification of the process Bolton Alimentari developed to identify areas covered in the Declaration and related principles and commitments, in order to analyse the activities developed for the identification of issues that are relevant with respect to the impacts generated by Bolton Alimentari for their business.

The third part verification was carried out between September and November 2011 at the Cermenate headquarters.

Verification Methodology

DNV Business Assurance carried out a third part verification through the following activities:

- Verification: consistency between statements and values and policies contained in organizational documents in effect during verification activites. The following documentation was evaluated:
 - Code of ethics
 - o "Quality Policy"
 - o "Health & Safety Policy"
 - o "Code of Social Responsibility"
- Interviews with business functions for Bolton Alimentari involved in the management of the activities being developed to carry out the 7 areas stated in the Declaration: project objectives, responsibilities, operating activities and related actions, monitoring.
- Analysis of the process, for the identification of contents and statements contained in the Declaration.
- Analysis of dialogue and engagement activities developed for stakehoders that Bolton Alimentari has identified.

Considerations and facts rose during the verification

It is the opinion of the DNV Business Assurance that the Bolton Alimentari "2011-2013 Our principles, Our Commitment" document contains statements that are consistent with their business values and strategies. Similarly, the commitments set out in the different sections of the document are supported by the development of specific activities aimed at achieving the stated objectives for Bolton Alimentari. This document is a statement of the values and commitments for Bolton Alimentari in their direction towards a progressive commitment of reporting on its own business activities and related impacts.

The structure of the document enables one to understand the areas that Bolton Alimentari considers relevant at the moment.

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We belive that an easier and direct correlation between the declared principles and committeents set out in the different sections could contribute in terms of clarity and effectiveness in communication.

The verification showed that parts of the contents of the Declaration were previously shared with the stakeholders considered representative: Bolton is committed to structure the process of the stakeholder's dialogue at this time.

We belive that could contribute positively to the identification of sustainability issues material to Bolton Alimentari and to the achievement of the objectives in the field of sustainability the ongoing project to identify stakeholders and the related structiring activity of the process of stakeholders' dialogue and engagement.

We believe the commitments stated in the document, in some areas, with a wider description of the actions that have been defined and implemented in order to achieve said committements, enable stakeholders to better understand the concrete initiatives and efforts carried out by Bolton.

We believe that could positively contribute to the full achievement of the defined objectives a more structured process for managing the ongoing activities, as well as, the identification of specific targets.

DNV's Competence and Independence

DNV is a leading provider of sustainability services, including the verification of sustainability reports. Our environmental and social assurance specialists operate in over 100 countries. DNV was not involved in the preparation of any statements or data included in the Report except for this Assurance Statement. DNV expressly disclaims any liability or co-responsibility for any decision a person or an entity may make based on this Assurance Statement.

For DNV Business Assurance

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Agrate Brianza (MB), 2011-11-24

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