



MODERN SLAVERY STATEMENT

2023 REVIEW



OUR BUSINESS & SUPPLY CHAINS

The company has an annual turnover of £65 Million, employing around 450 people based at its Head Office and manufacturing sites at Whitby, England, and Killeel, Northern Ireland.

Whitby Seafoods is a manufacturer and supplier of frozen and chilled seafood products to retail and foodservice businesses in the UK.

Over 80% of the fish we source comes from waters around the British Isles. We are supported by a partner in Vietnam for a proportion of our processing.

Other raw materials are sourced in smaller quantities from suppliers in China, Vietnam, Malaysia, Spain and Iceland.

Whitby Seafoods Ltd. is publishing this statement under the provision of the UK Modern Slavery Act 2015.

This statement refers to the financial year ended 31st December 2022.

£65 MILLION TURNOVER
450 PEOPLE DIRECTLY EMPLOYED
2 SITES





SUSTAINABILITY VALUES



SUSTAINABILITY

Care for the seas and oceans from which we source and support the people and communities who rely upon them.

Our mission is to challenge the status quo, improve value, quality and ethical standards in seafood.

Currently our focus is on:

- Sourcing responsibly.
- Promoting and supporting ethical behaviours for the people in our supply chain.
- Working legally and safely.
- Operating with minimal environmental impact.

Our raw material supply chains operate across a number of different countries. We have approximately 120 direct suppliers across all our raw material and other operational procurement. We recognise that many of our suppliers have suppliers of both material and labour. Our work has continued to focus on our direct suppliers over the last 12 months.

Modern slavery is an umbrella term used to describe offences of human trafficking, slavery, forced labour and domestic servitude. It also covers slavery-like practices such as debt bondage, sale or exploitation of children and forced or servile marriage.

All these examples involve one person depriving another person of their liberty, in order to exploit them for personal or commercial gain.

Our commitment to Human Rights is outlined in our policies which are available upon request. This is further reinforced through our membership of:

Sedex – www.sedexglobal.com

Stronger Together – www.stronger2gether.org



ORGANISATIONAL POLICIES



The company has the following policies in place to offer guidance to stakeholders and to mitigate the risk of modern slavery:

Forced, Bonded and Involuntary Labour.

Freedom of Association.

Young Workers.

Recruitment Policy.

Grievance Policy.

Anti-Bribery Policy.

Whistleblowing Policy.

Equal Opportunities Policy.

Employer Pays Principle Policy.

Remediation Procedure.

We take any allegations that human rights might have not been upheld properly with the utmost importance. We have a whistleblowing policy to give our team members in Whitby and Kilkeel the tools to report anything they feel is not right within our business.

We have incorporated the whistleblowing requirements of our customers into our sites where applicable.

We believe that fair and ethical treatment of employees and workers is fundamental to our success.

As such the company is committed to following the principles of the Ethical Trade Initiative (ETI) base code and communicating this to our team members. In 2022 we continued to engage with our land based suppliers in demonstrating that they have applied the ETI base code within their operations.





RISK ASSESSMENT



Whitby Seafoods employs risk assessment methodology to identify where priorities for further consideration should be taken.

The risk assessment takes into consideration the jurisdiction country for the fishing operations and catch area as well as the country the fish preparation takes place. We reference the SEA Alliance Fishery Risk Tool as well as the US Trafficking in Persons Report 2022. The company has prioritised seafood sourcing in its risk assessment due to the report issues in this sector and the importance of seafood to our overall business activities.

Risk mitigation is accounted for in the risk assessment.

Risk mitigation includes:

- **Direct feedback from the supplier (e.g. Sedex self-assessment).**
- **Involvement in multi-stakeholder efforts.**
- **Working towards, or achieving credible certification (e.g. ASC, Fairtrade, SMETA).**
- **Ability to demonstrate compliance with international law.**



The most challenging aspect of seafood supply is that the primary source of supply comes from fishing boats that spend a large proportion of time out of sight. Monitoring these boats and evidencing decent working standards at sea is an industry wide challenge. The UK's adoption of ILOc188 is a significant move to help reduce the ethical risk within a large proportion of our supply chain. We fully support the implementation of effective monitoring and action around this key piece of legislation.

In recognition of the complexities of the fish supply chain we actively participate in a number of multi-stakeholder industry initiatives. By working together, we achieve transparency through the key stakeholders and approach all issues in a collaborative way ensuring proactive and responsible actions are taken whilst reducing the chance of unintended consequences.



RISK ASSESSMENT



Whitby Seafoods are financially supporting the Fishing First Safety Management Project, a collaborative project to develop safety management onboard fishing vessels to the standard of the Fishing Safety Management (FSM) Code. 50 fishing vessels have joined the project which started in the South West of England and are receiving professional support to develop their safety management practices. Auditors from the new service will be visiting the vessels and working with the owners and skippers taking part in the scheme to support them in demonstrating compliance with ILO c188 Work In Fishing Convention by meeting the requirements of the Fishing Safety Management Code (MGN 596F). In 2022, the FSM project was scoped for Northern Ireland which included some of the vessels in our supply chain. This will start to be implemented in 2023.

The social performance of the Fishery Improvement Projects (FIPS) that we are stakeholders of is being tracked. The objective is to help FIPs reduce the risk of human and labour rights abuses and to provide a common framework for reporting on social performance in fisheries. All FIPs reporting on FisheryProgress.org are required to comply with the policy according to the phased implementation timeline. This is a key development in helping us with ethical transparency in our nephrops supply chain.

We are also members of the Seafood Ethical Action (SEA) Alliance. This body has been established by the seafood industry to provide a platform for collective engagement, to share information on emerging issues, agree best practice solutions, and provide a forum for collective pre-competitive action where it is not better fulfilled by an existing organisation. In 2022 the SEA Alliance updated their strategy and work plan. Importantly, this has given focus to the issue of the use of transit visas for fishers from non EEA (European Economic Area) countries. This system has been highlighted as a weakness by NGOs in relation to the potential for human rights abuses within the UK. Whitby Seafoods have been active with negotiations between fishermen's organisations so a common position can be agreed and presented to Government about the future of the visa system for fishers to ensure the reputation of the sector.

The company promotes the application of the Sedex self-assessment tool as its primary vehicle for managing ethical trading within its land-based supply chain. Whitby Seafoods will use the information provided to identify high risk suppliers and take appropriate action to drive improvement in labour standards. This includes the option of ceasing supply. This was evidenced in 2022, when Whitby Seafoods moved away from doing business with a strategic partner. Their long-term position on their ethical performance was a key driver in this decision.



We have developed a remediation tool internally and will collaborate with partners such as NGOs (non-government organisations), charities and law enforcement in creating effective protective measures should victims of modern slavery be identified.

The most common accreditations for Whitby Seafoods' business model that include ethical approaches to labour outside UK fishing are:

- A Sedex audit undertaken by an independent 3rd party.
- Aquaculture Stewardship Council (ASC) accreditation.
- An audit conducted by Whitby Seafoods.
- An independent human rights audit conducted by a competent 3rd party.

SEDEX

The Sedex tool allows Whitby Seafoods to view supplier self-assessment questionnaire answers against set ethical criteria. This allows the business to determine if any remedial action is required with the supplier. This tool is being used widely in the UK to drive ethical standards and mitigate risk in the supply chain.

Whitby Seafoods Ltd. is a member of Sedex.

(www.sedexglobal.com)

Sedex is home to one of the world's largest collaborative platform for buyers, suppliers and auditors to store, share and report on information quickly and easily. The platform is used by more than 43,000 members in over 150 countries to manage performance around labour rights, health and safety, the environment and business ethics.





By way of example, the Whitby Seafoods site have closed all the findings from the follow up independent ethical audit conducted in late 2021 and repeated an independent 3rd party Ethical Audit in August 2020 against the SMETA (Sedex Members Ethical Trade Audit) standard. We have committed to repeat this exercise every 2 years as minimum. In 2021 we invited our auditing partner to return to the Whitby Site to verify the findings of the 2020 audit.

ASC ACCREDITATION

ASC applies a third-party certification system to its accreditation. This ensures the program is robust, credible and meets best practice guidelines for standard-setting organisations as set out by ISEAL and the FAO (Food and agricultural organisation for the United Nations). ISEAL's mission is to strengthen sustainability standards systems for the benefit of people and the environment. Our Pangasius and Prawn supply chains take from ASC accredited sources.

The ASC standard has a section specifically to develop and operate farms in a socially responsible manner that contributes effectively to community development and poverty alleviation.

Within this there are clauses that drive minimum standards in the areas of:

- Forced and compulsory labour.
- Child labour and young workers.
- Health and safety.
- Freedom of association and collective bargaining.
- Discrimination.
- Working hours.
- Fair and decent wages.
- Labour contracts.





RISK ASSESSMENT



Audits and inspections play an important part of the due diligence system of supplier management.

Standards are used to compile evidence of compliance and identify any actions required to address any shortfalls against these. They are then prioritised into short, medium and long term action plans to show demonstrable development and continual improvement.

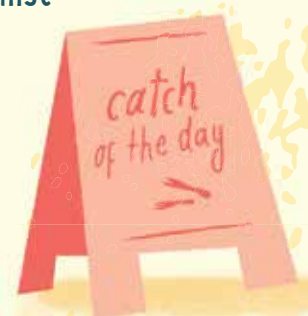
Audits are written to an internal standard and incorporate any customer requirements. They are an in depth look at the policies and procedures a company has and how they are applied.

Assessments are based on visual inspection and, by their nature, are based on what is seen at the time. These are utilised by Whitby Seafoods staff as part of wider supplier visits. These often look for physical signs of violations as indicated by training given.

In the summer of 2022, our Kilkeel operation resumed auditing suppliers in the supply chain. The purpose of the audits primarily relates to food safety, and product quality but also includes ensuring worker welfare and the welfare of fishing crews from which these agents buy seafood in our products. In 2022, we conducted 9 supply audits out of a supply base of 24 businesses. All suppliers must complete a supplier approval questionnaire which is reviewed annually, and suppliers are required to provide us with any updates if their business changes.

During the autumn of 2022, 7 vessel landings were observed by our Marine Sustainability Manager.

Labour provider audits have been conducted by the Whitby HR team against internal standards without any significant non-conformances.





TRAINING AND AWARENESS



Our employees and suppliers play a pivotal role in helping us to ensure that modern slavery violations do not take place in our business or supply chains.

In March 2022, our Marine Sustainability Manager completed the inaugural Fishing Safety Management (FSM) auditor 5 day training course. The course was created for participants who engage in the auditing of safety management systems. This course gives candidates knowledge in identifying the key auditing principles, the skills required to systematically prepare for and conduct an audit and the ability to report findings and recommendations effectively.

The FSM course is designed to encourage vessels to develop a Safety Management System, ideally using the SafetyFolder portal, which we use to measure ILO c188 compliance with our supply chain.

In 2022 we also:

- Documented our process flows for:
 - Pre-screening potential new suppliers for ethical risk
 - How to carry out the annual risk review
 - How to initiate a relationship with a supplier or customer on SEDEX
- Refreshed our employees awareness of our Whistleblowing Procedure
- Co-ordinated awareness of the issues around the UK transit visa system





MOVING FORWARD



As outlined in this statement, we continue to build a robust system to assist us in tackling the challenges associated with modern slavery in our supply chain. In 2022 we continued to progress our Sedex onboarding programme with key 1st tier suppliers which allows us to map and understand the risk within our supply chain. We also plan to embed more best practices into job roles within the business so the risk of modern slavery are mitigated more broadly.

We will continue to enhance our internal policies where we see gaps against best practice and through stakeholder feedback to put support mechanisms in place to encourage potential victims to make themselves known. We will arrange for an independent 3rd party ethical audit at our Whitby site in line with our commitment to our stakeholders.

We will continue to educate the business internally and within our supply chain. We have plans to expand our ethical awareness training into the areas of our business that have touch points with our suppliers.

We will engage with those suppliers that are flagged as red on our metrics to help them put appropriate actions in place to bring their risk rating back down.

Our UK nephrops supply base remains a focus for us going forward and our Marine Sustainability Manager will continue to forge partnerships within the industry to help improve transparency of ethical standards on board boats within our supply base.





MEASURING SUCCESS



We assess the effectiveness of our systems with key measures. These measures will be monitored throughout 2023 and reported on annually.

	2019	2020	2021	2022
1. Number of "Red rated" suppliers on the SEDEX platform.	0	0	6	3
1a. % of "Amber rated" suppliers on the SEDEX platform.	51%	51%	62%	57%
2. % of nephrops boats in our supply chain registered on the Safety folder website.	32%	39%	44%	41%
3. Number of proactive interventions made with respect to modern slavery.	26	9	1	16
4. Number of reactive interventions made with respect to modern slavery.	0	0	0	0

This statement has been approved by the board of directors of Whitby Seafoods Ltd. and will be updated and reviewed annually.

Daniel Whittle

Managing Director, Whitby Seafoods Ltd. March 2023

