

Modern Slavery Statement

2020/2021



Our Business & Supply Chains

The company has an annual turnover of £58 Million, employing around 400 people based at its Head Office and manufacturing sites at Whitby, England, and Kilkeel, 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.

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This statement refers to the
financial year ended
31st December 2020.

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£58 MILLION
TURNOVER

400 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, 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

Business in the Community
www.bitec.org.uk

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 2020 we continued to engage with our land based suppliers in demonstrating that they have applied the ETI base code within their operations.



Our Partners;



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 catch area as well as the country the fish preparation takes place. Seafish Social Risk Factors in Fisheries Profile¹ as well as the US Trafficking Persons Report 2020². The company has prioritised the sourcing of seafood as its main focus due to the nature and reported challenges in seafood sourcing.

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 achieved credible certification (e.g. ASC, Fairtrade, SMETA).
- Ability to demonstrate compliance with international law.

<http://www.seafish.org/responsible-sourcing/ethics-in-seafood/assessment-of-ethical-issues>

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. Policing these boats and evidencing ethical traceability is an industry wide challenge. The UK's adoption of IL0cl88 is a significant move to help reduce the ethical risk within a large proportion of our supply chain. We fully support the implementation, 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.

2020 saw the launch of the Responsible Fishing Vessel Standard (RFVS). Whitby Seafoods took the role of Peer Reviewer for the development of this new standard. This scheme intends to work as an assurance for crew safety and welfare on board fishing boats.

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.

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 cease of supply.

<https://www.state.gov/j/tip/rls/tiprpt/>

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

The most prevalent 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.
- A human rights impact assessment by an independent, competent 3rd party.



Sedex

The Sedex tool allows Whitby Seafoods to view supplier self-audit 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 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 also plan to carry out a SMETA audit at our Kilkeel site.



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.

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.

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

2020 proved a difficult year for physical visits to our supply partner sites. We took

an approach to build upon the relationships we already formed, finding common ground through shared adversity we all faced. We understand that physical visits play a role in mitigating risk and we plan to restart our visit programme once safe to do so.



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.

These include;

- Our Fisheries Improvement Manager completing the Stronger Together Tackling Modern Slavery in UK Supply Chains training.
- SEDEX RADAR training.
- Improvement of our New Product Development system to make ethical considerations earlier in the process.
- Amendment and re-training of our Whistleblowing Procedure.
- Amendment of our Remediation Procedure
- Participation in the Seafish Ethics Common Language Group.



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 2020 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. In 2021, we have a plan for engagement with Sedex to expedite this process and allow us to take targeted action for most impact.

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 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.

Our UK nephrops supply base remains a focus for us going forward and our Fisheries Improvement 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. Last year we published some key measures and this year we have added some relevant sub measures to track progress. These measures will be monitored throughout 2021 and reported on annually.

	2018 Result	2019 Result	2020 Result
1. Number of "Red rated" suppliers on the SEDEX platform.	0	0	0
1a. % of "Amber rated" suppliers on the SEDEX platform.	65%	51%	51%
2. % of nephrops boats in our supply chain registered on the Safety folder website.	19%	32%	39%
3. Number of proactive interventions made with respect to modern slavery.	34	26	9
4. Number of re-active interventions made with respect to modern slavery.	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. February 2021



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