

MODERN SLAVERY STATEMENT

2026 REVIEW



OUR BUSINESS & SUPPLY CHAINS

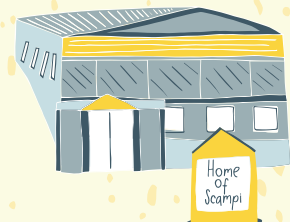
Whitby Seafoods is publishing this statement under the provisions of the UK Modern Slavery Act 2026. We manufacture and supply frozen and chilled seafood products to retail and food service businesses in the United Kingdom.



Wild Nephrops sourced from **347** vessels and Farmed prawns sourced from **1** farm.



15 packaging, **24** ingredient suppliers and **21** service providers.



2 factories located in Whitby and Kilkeel.



131 customers from supermarkets to food service providers.



3.7m households enjoy our products and **28.8m** servings enjoyed outside of the home.

80% of the seafood we source comes from the British Isles in the form of Scampi, commonly known as Langoustine, Dublin Bay Prawns and Norway Lobster. A small proportion of our processing is carried out by a partner in Vietnam, which is certified and SEDEX audited.

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

This statement refers to the financial year ended 28th December 2025.

£70.6 MILLION TURNOVER

308 PEOPLE DIRECTLY EMPLOYED

2 SITES





SUSTAINABILITY VALUES



SUSTAINABILITY

We 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.

Our focus continues to be on:

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

We have approximately 120 international direct suppliers across all our raw material and other operational procurement. We recognise that many of our suppliers utilise third parties for materials and labour. We continue to promote our policy within our supply chain.

Modern Slavery is an umbrella term used to describe
“when an individual is exploited by others, for personal or commercial gain...”

– Anti-Slavery International

Our commitment to Human Rights is outlined in our policies, which are available upon request and adhered to through our membership of:

Sedex – www.sedexglobal.com

Stronger Together – www.stronger2gether.org



ORGANISATIONAL POLICIES



Our business 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.**
- **Grievance.**
- **Anti-Bribery.**
- **Whistleblowing.**
- **Equal Opportunities.**
- **Employer Pays Principle.**
- **Remediation.**

We take human rights allegations seriously and have a whistleblower policy at Whitby and Kilkeel Seafoods, to allow our teams to raise any concerns. We have also incorporated customer whistleblowing requirements at our sites where applicable.

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

As such, the business is committed to following the principles of the Ethical Trade Initiative (ETI) base code and communicating this to our team members. We continue to engage with our land-based suppliers in demonstrating that they have applied the ETI base code within their operations.





RISK ASSESSMENT



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

This assessment considers the jurisdiction country for the fishing operations, catch area, and where fish preparation takes place. We reference the US Trafficking in Persons Report 2022. We have prioritised ethically sourcing seafood in our risk assessment due to the reported issues in this sector.

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 main challenges in the seafood supply chain are monitoring boats and ensuring good working standards while at sea. We support the UK's ratification of ILOc188, a significant move aimed at reducing the ethical risk within a large proportion of our supply chain.

We actively participate in multi-stakeholder initiatives, including the Sustainable Seafood Coalition, MSC Improvement Programs Social Responsibility Working Group, and the Shellfish Association of Great Britain. By working together, we aim to act more decisively and transparently as an industry.

MSC IMPROVEMENT PROGRAM

The social performance of the UK Nephrops fishery continues to be tracked. The project UK Fisheries Improvement Program (FIP) finished in 2024, and the Nephrops fishery has now entered the MSC Improvement Program (2025-2030). Poseidon, on behalf of the UK Nephrops MSC Improvement Program and Seafish, has carried out a Human Rights Impact Assessment on the fleet and processors in 2025/26. This work will inform the action plan driven by the social responsibility working group in 2026.

RISK ASSESSMENT



SEDEX

The business uses the Sedex self-assessment tool to manage ethical trading within its land-based supply chain. We use the information provided to identify high-risk suppliers and take appropriate action to improve labour standards. This allows us to take remedial action if required with the supplier, including the option of ceasing supply, if actions to strengthen ethical standards are not progressed.

We have developed an internal remediation tool and will collaborate with partners such as NGOs (Non-Governmental 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.



RISK ASSESSMENT

ASC ACCREDITATION

Our business purchases king prawns solely from ASC-accredited sources. ASC applies a third-party certification system, ensuring the programme is credible and robust, and meets best practice guidelines set by ISEAL and FAO (Food and Agriculture Organisation).

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

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

AUDITS

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

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

Audits are written to a high internal standard and incorporate any customer requirements. They provide an in-depth look at our business policies and procedures and their application.

Assessments are a point-in-time visual inspection. Whitby Seafoods staff use them as part of wider supplier visits and look for physical signs of violations, as indicated by the internal training.

Kilkeel Seafoods has continued auditing its Nephrops suppliers to ensure food safety, product quality and worker welfare. All suppliers must also complete a supplier approval questionnaire that is reviewed annually and report any changes within their business.

Audits of labour providers are conducted by the Whitby HR team against internal standards without any significant non-conformances.





TRAINING AND AWARENESS



TRAINING

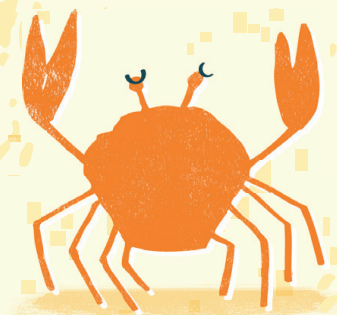
One of our main focuses is raising awareness and providing adequate training to our employees. We conduct modern-day slavery training as a standard part of our induction process, with refresher training carried out every three years. Enhanced training is provided to members of the sustainability and ethics team through Stronger Together.

KPIs

Once the Social Risk Assessments or equivalent frameworks are in place, it may be possible to report more relevant KPIs for the highest-risk part of our supply chain – the Nephrops catching sector.

Whitby Seafoods uses the indicators below to identify areas of risk in the business and within our supply chain:

KPI	2025	2024
Number of modern Slavery cases reported at our sites	0	0
% of staff that have completed onboarding Modern Slavery training	100	100
Number of whistleblower reports concerning exploitation at our sites	0	0
% of High risk suppliers (Sedex)	5	14
% of Medium risk suppliers (Sedex)	53	59
% of Low risk suppliers (Sedex)	38	25
Number of Modern slavery reports raised by industry, media, HRASi and ITF.	2	1





MOVING FORWARD



We will continue to concentrate on the UK and Irish Nephrops Fleet, especially those with migrant crew. Concurrently supporting the Human Rights Impact Assessment (HRIA) action plan and its completion from our place within the MSC Improvement Program and Steering Group. In 2026, an action plan report will be finalised, providing our business and industry with an in-depth understanding of potential risks and remediation actions, where needed.



Trials are continuing into 2026 for the Nephrops de-header and stunner machine aboard the MFV Golden Ray, which will improve crew rest hours and animal welfare practices. Although Whitby Seafoods no longer has direct involvement with the trials, which are led by Optimar and FIS (Fisheries Innovation & Sustainability), we continue to monitor its progress and hope for future adoption by the UK Nephrops fleet.

We will continue enhancing our internal policies where we see gaps relative to best practices and stakeholder feedback, and put in place support mechanisms to encourage potential victims to engage.

Our UK Nephrops supply base remains a priority for us, and our Sustainability Director and team will continue to forge partnerships across the industry to improve transparency around ethical standards on board vessels in our supply chain.

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

Laura Whittle

Managing Director, Whitby Seafoods Ltd. June 2026

