



NEW ENGLAND SEAFOOD INTERNATIONAL LIMITED

Modern Slavery Statement 2021

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It provides detailed information on our business activities and commitments to mitigate against the risks of modern slavery in our business and our supply chains and makes clear the steps we took in our financial year 1st November 2019 to 31st December 2020¹.

Introduction

Despite the existence of global laws and systems, the sad reality is that people all around the world remain vulnerable to modern slavery and human trafficking. New England Seafood International (NESI) respects all human rights and we do not tolerate Modern Slavery in our organisation or in our supply chains. This is our fourth Modern Slavery Statement in accordance with the Modern Slavery Act 2015.

Our business and supply chains

NESI is the UK's leading supplier of premium wild and farmed fish and seafood into the UK market. Our product range consists of species that are sold under many major supermarkets' own labels, as well as our own brands 'Wild Fish Discovery', 'Fish Said Fred' and 'LEAP'. We also supply products that end up in well-known foodservice brands in both the UK and in Europe. Our core business purpose is 'to enhance lives through fish' so that all those, from the fishers and farmers, to our employees, the communities in which we operate and the consumers that we serve, benefit from NESI's business activities.

The business was founded in 1991 and was a privately owned business up until 30th October 2020 when the business was acquired by Sealaska, a for profit Alaska Native Corporation. Sealaska corporation was founded in 1972, when the Alaska Native Claims Settlement Act (a treaty between the US government and the Native tribes of Alaska which settled a long-standing dispute around land ownership rights) created 12 Native corporations. Sealaska is owned by 23,000 Tlingit, Haida and Tsimshian shareholders with more than 10,000 years of ancestral ties to the oceans, forests and communities of Southeast Alaska. It has a mission to protect its community's greatest and most important resources – the oceans, forests, and people of Southeast Alaska. Profits from the group are invested to better the lives of those communities and help create a healthy and prosperous future.



We source fish, ingredients and other materials from around 32 countries across five continents.



We have two office and processing sites (in Grimsby and Chessington), employing just under 700 people from more than 75 countries.



We pride ourselves on taking a partnership approach with our suppliers; many of whom have been our suppliers since the business was founded 30 years ago.



We do not own or operate any fishing vessels.

¹ The current reporting period includes a significant milestone in the Group's history, with the transition of ownership of the Company to the Sealaska Corporation in October 2020. As a result of the sale, the Company financial period end has changed from 31st October to 31st December. As such this statement covers the 14-month period ending 31st December 2020. Turnover for the reporting period was £177m.



Governance

Our modern slavery strategy is approached cross functionally by members of the Ethics Committee that was set up in September 2018. During this reporting period, our Ethics Committee was made up of the following members, allowing us to take a business wide approach to this topic:

- Amber Madley – Ethics Manager & Acting Head of Sustainability – Committee chair
- Dan Aherne – CEO
- Darren Beecham – Chief Operating Officer
- Adam Peasey – Managing Director, Species
- Neil McCormick – Site Director, Chessington
- David Jeffries – Group Technical Director
- Ginette Ferri – People Manager, Chessington
- Des McMenamain – People Manager, Grimsby
- Lucy Blow – External Sustainability Consultant

Our ethics vision very much builds on our core business purpose, ‘to enhance lives through fish by protecting the human rights and ensuring decent working conditions for all those that work in or for our business’. With this vision in mind, in July 2020, the committee expanded the membership to the following four colleagues which allowed the committee to have a broader supply chain focus:

- Darryl Lee – Species Director, Bass & Bream
- Dominic Collins – Species Director, Whitefish
- James Robinson – Species Director, Tuna
- Max Ropner – Species Director, Wild Salmon

Our Policies

We have a variety of policies in place aimed at protecting our own employees and suppliers from the multi-faceted aspects of modern slavery:

- Equal Opportunities and Diversity at Work policy - applicable to all employees
- Disciplinary policy - applicable to all employees
- Anti-bribery policy - applicable to all employees
- Navex Global – Independent Whistleblowing hotline, available in multiple languages and accessible 24 hours a day
- Grievance Policy and procedure - applicable to all employees
- Trading Charter – applicable to all employees and suppliers
- NESI Ethical Policy – applicable to all employees and suppliers

One of our five core company values is “respect for the environment, natural resources and people” and our social requirements are consistent with the ETI Base Code. We believe firmly in fair, open, and honest trading and always seek to develop long-term partnerships with our suppliers who are prepared to commit to our values. We require our suppliers to demonstrate (through audit) fair and ethical treatment of their employees and other stakeholders as well as compliance to national regulations.

We understand the benefit that our policies and risk assessments give to help tackle modern slavery and we acknowledge the need to regularly review and update policies to ensure that they are adapted to reduce the risks to our business.



Collaboration and External Engagement

We recognise that tackling modern slavery on a global scale is an issue that no business can resolve alone. As such, we participate in a variety of multi-stakeholder initiatives which enables us to increase and leverage our influence within our industry and across our supply chains.



We have been an 'AB' (Buyer/Supplier) member of Supplier Ethical Data Exchange (Sedex) since 2011, this being a pre-requisite to supplying our customers. Sedex also allows us to conduct an effective risk analysis of our supply chains.



We sit on the Steering Committee of the Seafood Ethics Action Alliance (SEAA) and we are part of the Seafood Ethics Common Language Group (SECLG). Both groups, run by Seafish, focus specifically on the provision of human rights at sea.



We became members of the Food Network for Ethical Trade (FNET) in February 2020. FNET was established in 2016 by a number of major UK food companies to improve human rights in global food supply chains through a common approach to managing ethical trade.

In addition to the above memberships, we provided feedback into the following public consultations and assessments throughout the 14-month reporting period:

- On behalf of the SEAA, NESI was part of the small review team looking at the PAS 1550* to contribute to its development as a practical industry toolbox which businesses can draw from to identify and enable best practice in upstream risk assessment and mitigation measures. (**The PAS incorporates labour issues and considers illegal treatment of crew on fishing vessels to be linked with illegal fishing*).
- In March – April 2020 we provided feedback to the Responsible Fishing Vessel Standard (RFVS) through our Technical Working Group membership which led to the Eligibility Criteria being signed off ahead of the launch of the RFVS standard in June. The RFVS is a voluntary, vessel-based certification standard that enables commercial fishing operations to provide assurance of decent working conditions and operational best practice through independent, third-party auditing. Its strong focus on crew welfare on board fishing vessels is underpinned by Work in Fishing Convention ILO C188 and other global conventions.
- In June 2020 we gave our feedback to the draft 'Social Policy on the Protection of Human Rights in Fishery Improvement Projects (FIPs)' created by FisheryProgress.org. The organisation has been working to develop a permanent social responsibility policy, with the aim of significantly reducing the risk of human rights and labour violations occurring on FIP vessels that would be practical for FIPs to implement.
- In August 2020 we provided feedback to the draft 'At Sea Operations Social Benchmarking Criteria' developed by The Consumer Goods Forum's Sustainable Supply Chain Initiative (SSCI) and the Global Sustainable Seafood Initiative (GSSI). The criteria, developed by industry leaders, experts and stakeholders from SSCI and GSSI cover social and scheme management requirements specifically for third-party social compliance schemes evaluating At Sea Operations in the seafood sector.
- As a signatory to the [Tuna 2020 Traceability Declaration](#), NESI was assessed against the social responsibility pillar of the Declaration through two annual progress surveys at the end of 2019 and 2020. The results of the surveys benchmarked NESI against other Declaration signatories and highlighted where progress could be made. NESI will continue to be assessed on social responsibility in its tuna supply chains via the Global Tuna Alliance 5-Year Strategy and 2025 Pledge Towards Sustainable Tuna.



Risk assessment, prevention, and mitigation

We risk assess, prevent, and mitigate risk of modern slavery across our own sites in the following ways:

- Both of our sites undergo bi-annual SMETA audits. Our Chessington site underwent a SMETA audit in December 2019 which included 26 workers being chosen for interviews. The auditor noted that that we had a detailed and publicly available modern slavery statement as a 'Good Example' within the audit report.
- Sedex's new risk assessment tool 'Radar' allows us to explore human rights risks within our business and supply chain. The tool did not flag any activity risk of forced labour at either of our sites, nor in our wider supply chains.
- Both of our sites have active Site Engagement Forums (SEF) – and all SEF members have completed their online Stronger Together course on 'Tackling Modern Slavery – UK Businesses'. The SEF at Chessington is made up of 14 representatives, covering all of our shifts and offices and the group meet fortnightly. The SEF at Grimsby is made up of 6 representatives and cover all shifts and the group meet monthly.
- All labour providers used by both our sites hold a GLAA licence and are audited as a minimum every 6 months. These audits include carrying out worker interviews with agency workers.

We risk assess, prevent and mitigate risk of modern slavery in our supply chains in the following way:

- We require our suppliers to become members of Sedex and to provide us with visibility of their SAQ and audit information to help us understand and mitigate risk in our supply chains. For suppliers unfamiliar with Sedex, this can take a significant amount of cross functional effort.
- In July 2020, we initiated monthly reports for our Board, covering the Sedex compliance of our seafood suppliers which helped to give transparency into our supply chain from the top down, as well as allowing us to effectively assess the risks within our supply chain.
- In addition to monitoring our suppliers on Sedex, working collaboratively through FNET allowed us to address a broad spectrum of welfare issues. We co-sponsored a FNET working group that was set up to share best practice and learnings to address a number of challenges felt across the UK and within global supply chains as a result of the Covid pandemic.
- In November 2019, a member of our Sustainability team was invited to present at the Traceability and Transparency Symposium in Seoul, South Korea, on tuna sustainability, including the human rights agenda. The section of the presentation on human rights focused on the legal and moral obligation that we have to ensure that there are no links to human rights abuses or modern slavery in our supply chain, along with the need for co-operation and transparency. The conference was attended by suppliers, government officials and NGOs.
- The arrival of Covid 19 to the UK in March 2020 caused disruption to many planned supplier visits. However, our in-house seafood expert who has expansive experience of auditing farms and processing sites conducted in person audits of three Turkish suppliers in September 2020. The audit questionnaire contains several elements relating to modern slavery, based on the ETI base code.
- Our Ethics Manager gave a virtual presentation at the third Korean Roundtable for Sustainable Tuna, hosted by WWF, in December 2020 where we set the context on the human rights agenda before going into detail on our approach, and concluding with information about the Social Responsibility pillar of the Global Tuna Alliance. The event was attended by 17 representatives from the largest Korean fishing companies, the Korea Overseas Fisheries Association and the Ministry of Oceans and Fisheries.
- Our wild seafood suppliers who are Marine Stewardship Council (MSC) certified have been required by MSC, since August 2019, to report publicly on the measures they are taking to address forced and child labour. Whilst we recognise that these statements are self-disclosures, they provide a useful baseline into the main management authorities/agencies involved in ensuring fair labour practices



and regulations in the fisheries that we source from. We use this information as part of our due diligence processes of sourcing from that fishery.

- All of our aquaculture suppliers are audited against one of the following third-party standards (Aquaculture Stewardship Council, Global Gap or Best Aquaculture Practices), all of which include an assessment of the ethical treatment of labour.
- Any new supplier must first be approved by the ethical team. Approval takes into account the various information sources mentioned above.

Due Diligence Processes

In order truly to achieve our ethics vision of ‘enhancing lives through fish by protecting the human rights and ensuring decent working conditions for all those that work in or for our business’ we have to go beyond ticking the box and really get into our supply chains by having, at times, uncomfortable conversations to seek out the assurances that we need. Yellowfin tuna and wild Pacific salmon account for approximately 40% of our turnover, hence these are species that received our greatest focus in the reporting period:

Yellowfin Tuna: In June 2020, reports and investigations made by two NGOs exposed issues faced by fishermen on some of the Republic of Korea’s fishing fleet, including their distant water tuna vessels. Although the reports did not give details such as vessel names which would allow us to check if we sourced from those particular vessels, we are aware that poor recruitment practices, excessive working hours and lengthy fishing trips are commonplace in parts of the distant water fishing sector. As such we put considerable efforts into our due diligence towards this supply chain.

- We created and sent a letter, co-signed by all of our retail customers, to the Republic of Korea’s Government, requesting them to ratify and implement ILO Work in Fishing Convention C188. This received a formal response acknowledging the situation and the steps the government were considering.
- With Covid-19 preventing us travelling to visit our suppliers, we instead put in place a strong communication plan, which included CEO to CEO calls and ultimately led to regular conversations on the social agenda where we could get detailed insights into how crew are hired and their working conditions.
- We hired the award-winning ethical trade consultancy Impactt to provide their professional opinion on likely labour and human rights risks presented to us in our supply chain, which allowed us to be decisive about where to focus our efforts with suppliers and develop corrective actions where required.
- To further leverage our influence, in October 2020 we presented to senior representatives from major fishing companies and to their industry representation on the need to be open and transparent with regards to this agenda, and we arranged for one of our major retail customers to present to the same forum in December to help reinforce the critical message of respecting human rights.

Whilst we were pleased to see the Republic of Korea’s Government make a public commitment in December 2020 to drive improvements across key areas such as recruitment and working hours, we know that we must continue to engage our key tuna suppliers, NGOs, industry and government to have the most impact. This remains a key focus area for us going forward.

Wild Pacific Salmon: In October 2020 we became aware of an ongoing public lawsuit focused on working and living conditions in Alaska, one of our key wild salmon sourcing areas. Although the lawsuit did not involve any of our suppliers, we used it as an important moment to re-engage our suppliers about the importance of ethical transparency, including third party ethical audits.



Training and Capacity Building

We understand that the duty to prevent modern slavery within our supply chain requires companywide participation. As such, the following activities are of note within the reporting period of this statement:

- All new starters attend a 2-day company induction at the start of their employment, which covers off Modern Slavery, and Stronger Together, including what actions to take if anyone suspects any cases within our sites.
- In August 2020 we organised a refresher meeting on Sedex for colleagues with accountability in this area, which ensured better understanding of the platform's key features and the ETI base code.
- We marked Anti-Slavery Day in October 2020 by sharing content on how to spot the signs of modern slavery; how to report modern slavery at work and in the community; reminding colleagues where they could find our Modern Slavery Statements; as well as sharing video content produced by Stronger Together and the International Labour Organisation.
- We also marked Human Rights Day in December 2020 for the first time as a company, by creating a 4-minute video covering the history of human rights day; what the UDHR is and providing information on what we are doing to protect the human rights of all those that work in or for our business.

Tracking Progress:

We developed a number of actions in line with our ethics vision throughout the 14 months that this modern slavery statement covers and achieved the following commitments that were outlined in our 2020 statement:

- We improved representation on the Ethics Committee by adding four new members.
- We continued to attend SEAA, Seafish Ethics Common Language Group meetings and other relevant meetings which cover human rights / modern slavery.
- We created board reports to track progress of supplier ethical audit results and corrective action plans.
- We hired an expert independent third-party organisation to help us ensure the integrity of our investigations into working conditions in our Korean supply chains.
- We extended modern slavery training further into our business to increase awareness:
 - All members of the Operating Board and Senior Management Team, down to our Operational Area Managers, as well as members of our Species Team have completed Modern Day Slavery training at our Chessington site, along with 15 colleagues from various departments from our Grimsby site.
- We raised awareness across the entire business by marking Anti-Slavery Day and Human Rights Day.

In the next 12 months (Jan – Dec 2021) we will continue to strengthen our approach to managing the risk of modern slavery within our business and supply chain. We will ensure our strategy is responding to changing risk by taking action in the following ways:

- We will review our policies to ensure they remain fit for purpose.
- We will review the communications displayed around sites to continue to raise awareness of Modern Slavery and ensuring people know how to raise concerns either inside or outside of work.



- We will complete the Stronger Together “Progress Reporting Tool” and subsequently create an action plan with key focus areas to drive improvements.
- We will consider becoming a member of the Association of Labour Providers (ALP) to help promote responsible recruitment at our two sites.
- We will map the non-conformances from our suppliers SMETA audits to classify the most common risks that exist across our different species and geographies, which will help us prioritise specific labour rights risks.
- We will work with our suppliers to understand what modern slavery training they have done for their employees.
- We will work with our suppliers to map the use of recruitment fees and identify hotspots, and develop action plans.
- We will continue to work closely with our Korean tuna suppliers and the wider industry to verify the improvements outlined by the Korean Government.
- We will engage with recognised third-party vessel certification standards.

We will report back on the following KPIs in our 2022 Modern Slavery Statement:

- Number of policies reviewed and updated.
- Percentage of super temps that have completed Stronger Together training.
- Number of people from both sites who have completed Responsible Recruitment Training.
- Number of FNET working groups actively engaged in.
- Number of full GLAA audits conducted and number of non-conformances raised.
- Percentage of whistle-blower cases related to modern slavery issues raised through Navex Global and percentage of those closed out.

Whilst we are proud of the many steps we have taken over the 14 month reporting period that this statement covers, despite the obvious challenges in travelling globally that have impacted every business, we recognise that much difficult work lies ahead. NESI will continue to raise awareness of the existence of forced labour and modern slavery in global supply chains and further strengthen our identification and due diligence processes. We will continue to invest resources to work with industry players, NGO’s and Governments around the world to effect positive change where it is needed and to ensure that we truly do enhance lives through fish.

A handwritten signature in black ink, appearing to read 'D. Aherne', is positioned above the typed name.

Signed by Dan Aherne, NESI Group CEO

26.05.2021