



MODERN SLAVERY STATEMENT

2024 REVIEW

OUR BUSINESS & SUPPLY CHAINS

We manufacture frozen and chilled seafood products for the UK retail and foodservice markets.

Over 80% of the fish we source comes from waters around the British Isles in the form of Scampi, commonly also known as Langoustine, Dublin Bay Prawns and Norway Lobster (Scientific name *Nephrops norvegicus*). We are supported by a long standing, SEDEX audited and certified partner in Vietnam for a small proportion of our processing as well.


Other raw materials are sourced in smaller quantities from suppliers in China, Vietnam, Malaysia, USA, Peru, 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 2023.

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£67 MILLION TURNOVER
420 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 improve value, quality and ethical standards in seafood, challenging the status quo where necessary.

Currently our focus is on:

- Sourcing responsibly.
- Promoting and supporting ethical behaviour 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

Seafood Ethics Action Alliance (SEA Alliance) - www.seaa.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 2023 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 reported 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, such as the SEA Alliance.**
 - **Working towards, or achieving credible certification (e.g. ASC, Fairtrade, SMETA).**
 - **Ability to demonstrate compliance with international law.**
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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 good 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 financially supported the Fishing First Safety Management (FSM) Project, a collaborative project to develop safety management onboard fishing vessels to the standard of the Fishing Safety Management (FSM) Code in 2022. Fifty 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). The FSM project was scoped for Northern Ireland, which included some of the vessels in our supply chain, and will likely be adopted there by the end of 2024.

The social performance of the Fishery Improvement Projects (FIPS) that we source from are being tracked. This includes the Project UK Nephrops FIP that is currently transitioning to the In Transition to MSC (ITM) for UK Nephrops. Within the scope of the ITM is an agreement by all stakeholders to conduct a Social Risk Assessment on the UK Nephrops fleet against an agreed framework. The benchmarking will create an action plan that will be monitored and controlled through the steering and working groups of the ITM.

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 ceasing supply.



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 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)





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.

Throughout 2023 and on into 2024 Kilkeel Seafoods have continued auditing their Nephrops suppliers, with the primary purpose relating to food safety and product quality but it also includes the opportunity to observe measures in place to ensure worker welfare. In 2023, we conducted 15 supply audits out of a supply base of 24 businesses. All suppliers must also complete a supplier approval questionnaire which is reviewed annually, and suppliers are required to provide us with any updates if their business changes.

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





TRAINING AND AWARENESS



TRAINING

We will continue to invest in the Stronger Together Modern Slavery Training and Sedex online training, and are looking to put the Fleet Director through the FSM Auditor training as per the above in 2024.

KPIs

Once the SRA or equivalent frameworks are in place (2024–5) it will potentially become possible to report more relevant KPIs to the assigned highest risk part of our supply chain – the Nephrops catching sector. Until then we are still using the SEDEX dashboard to monitor our other supplier's performance. Furthermore, we have audited 15 of the 24 intermediaries within our Nephrops supply chain.





MOVING FORWARD



In the near future, attention will continue to be focussed upon the UK and Irish Nephrops fleet, especially those with migrant crew working aboard. From here, we will support the action plan and its completion from our place within the ITM Working and Steering Groups, particularly given our recent acquisition of MFV Golden Ray, a Nephrops trawler fishing out of Portavogie, Northern Ireland. The skipper, Darren McClements, has joined the Kilkeel Seafoods board, as Fleet Director, and will give us additional insight and understanding as to the applicability and suitability of proposed measures coming from the Social Risk Assessment.

Closer to home, 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 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 Sustainability Director will continue to forge partnerships within the industry to help improve transparency of ethical standards on board boats within our supply base.

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. May 2024

