

Slavery and Human Trafficking Statement

Introduction

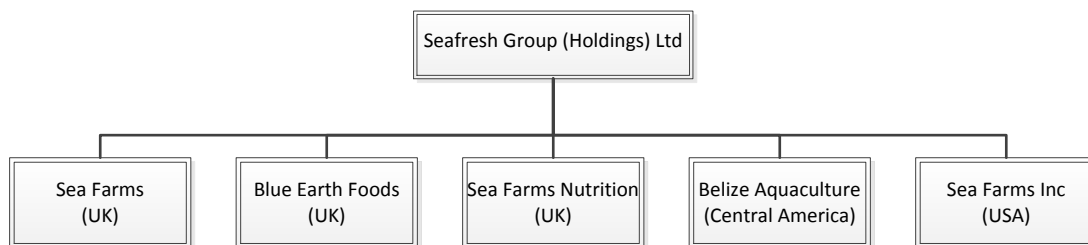
Seafresh Group (SFG) is involved in the production, sourcing and distribution of seafood in several countries on a global scale. Seafresh Group purchases seafood originating from both fishing and aquaculture operations, from the UK and foreign countries. Seafresh Group then adds value, packs and distributes seafood products for the UK retail sector. Seafresh Group also operates facilities and employs workers in Thailand and Belize.

Seafresh Group is committed to identifying and addressing any form of slavery or trafficking of workers, both in our own operations in relation to worker recruitment routes, and in our supply chains. We define “slavery” as every form of slavery, servitude, forced labour or compulsory labour, and “trafficking” as facilitating the travel of someone for the purpose of exploitation’.

This statement covers Seafresh Group operations in the UK and all related seafood supply chains globally. This statement is reviewed annually at the end of the company’s financial year.

Structure and Supply Chains

Seafresh Group is a holding company that includes Sea Farms Ltd and Blue Earth Foods Ltd based in Redditch in the UK, which source, process and distribute seafood products to the UK retail sector. Seafresh Group also includes Sea Farms Nutrition in the UK, Sea Farms Inc in the USA and Belize Aquaculture. Seafresh Group sources seafood for the UK market from its operations in Thailand and Belize, and from third-party suppliers located in Europe, Asia, North and South America.



Seafresh Group’s products include farmed and wild species of mollusks, crustaceans and to a small extent fishes. Warm water prawns are the main species produced and sourced by the Group in tropical countries, including Thailand, Belize, Honduras, Vietnam, and Madagascar. Feeds used in farms include marine ingredients made from species caught in the oceans. Such feed ingredient supply chains are complex and

there is limited visibility on the origin of the fish and even less on labour conditions on board vessels supplying the fish used to make feed ingredients.

Seafresh Group's director of sustainability is responsible for the implementation of control measures of ethical risks in the supply chains. Human Resources and Supply Chain Development teams manage the control measures in all Group operations and supply chains.

Policies

Seafresh Group has adopted an Ethical Sourcing policy which states our commitment to maintaining transparency in our supply chains, assessing risks to human and labour rights, and eliminating any situation of abuse that may be identified. It is complemented by a Sustainability policy which recognizes the responsible management of social aspects as a key component of the overall sustainability of our supply chains, and an Anti-Corruption policy which sets the rule for an ethical conduct for all SFG employees in their duties and functions.

Each SFG subsidiary has specific Human Resources policies and procedures covering employment conditions and the responsibilities of the company with all employees.

All SFG companies commit to comply with national regulations and adhere to the spirit of the Ethical Trading Initiative Base Code, and we expect the same commitments from all our suppliers. We are a member of SEDEX and we contributed to its initial development as a Board member

Seafresh Group is committed to maintaining transparency of its supply chains, and informing its customers of challenges and improvements.

Seafresh Group actively supports industry initiatives that work for the establishment of responsible practices in the fishing and aquaculture sectors. We are members of the Global Aquaculture Alliance (GAA) and we actively contribute to the development of the Aquaculture Stewardship Council (ASC), which both promote the adoption of responsible labour and social practices in the aquaculture industry. We support and contribute to Seafish activities in the UK in favour of responsible practices in the fishing industry, including the development of risk assessment tools.

Risk Assessments

Seafresh Group has developed a risk assessment methodology to map out the different levels of ethical risk for each supply chain and production facility. The structure is based on decision trees that are specific to land-based facilities and fisheries operations separately due to the specific risk factors involved in fishing.

The assessment is based on country-specific information (such as the ratification of ILO conventions, the Corruption Perceptions Index, the Trafficking In Person report, and criteria relating to Illegal, Unregulated and Unreported fishing due to the link with labour issues), supplier specific information from third-party assessments (such as

certifications and SEDEX), and also supply chain knowledge from both internal and external (NGOs) information.

Seafresh Group requires all direct suppliers to be registered on SEDEX and to fill the self-assessment questionnaire. We also collect additional information through an internal questionnaire and periodic visits of suppliers.

We consider all credible reports from NGOs or the media on specific issues in specific countries or activities relating to seafood production. We also establish partnerships with NGOs in countries of critical importance, such as Stronger Together in the UK, the Issara Institute and the Seafood Task Force in Thailand, which provide us with insights on risks in specific activities based on their own independent assessments, and also recommendations on measures to be considered for mitigating those risks.

Facilities and supply chains are rated based on our decision trees as Low, Medium or High risk, and that determines our level of scrutiny and action for mitigating risks.

High risk supply chains include farmed prawn from Thailand, mainly because of the reliance of the industry on migrant workers and the historical low level of enforcement of labour and fishing regulations, especially in the fishing industry which supplies fish to make fishmeal for prawn feeds. Other high or medium risk supply chains in China, Canada, Iceland, Spain and the UK result from either a lack of visibility of working conditions on board fishing vessels, a lack of third-party verification or the reliance on migrant labour. The engagement of facilities with NGOs to address their own labour risks allows for reducing the risk rating by one level as NGOs play an essential role in protecting human rights by providing tools for identifying and mitigating risks and issues.

Due diligence and risk mitigation

We work to enable full visibility of our supply chains back to individual fishing vessels, farms, and suppliers of marine ingredients used in aquafeeds. This is maintained through a questionnaire filled by our suppliers, which details the structure of their supply chain, and a comprehensive traceability system that allows for identifying all facilities involved in the custody of any product lot. Our traceability goes back to fishmeal producers and supply vessels in the case of high risk supply chains. Our staff periodically visits suppliers and inspect facilities to verify working conditions and information on their supply chain.

We request that all our direct suppliers register as member of SEDEX and fill the self-assessment questionnaire, which allows for a risk rating generated by SEDEX algorithm. All Medium and High risk supply sites are requested to conduct periodic SMETA audits, and audit reports and corrective actions are visible to us and our customers on SEDEX.

All aquaculture facilities in our supply chain, including farms, hatcheries and feed mills are certified against Best Aquaculture Practices (GAA) and ASC standards, which allow for reducing labour risks.

In case of specific high risks, we engage with NGOs for improving our level of oversight of supply chains and better mitigating risks.

In Thailand, Seafresh Group is an active member of the Seafood Task Force, which develops mechanisms for establishing an oversight of the entire prawn supply chain back to the origin of fish used for making fishmeal. This work covers legality aspects of both the fishing activities and working conditions of the entire Thai supply chain. Seafresh Group is also a partner of the Issara Institute in Thailand and we work closely with the Issara team for analysing workers' feedback received by Issara's call centre from our entire Thai supply chain and addressing issues identified. Seafresh Group also collaborates with the Issara team for assessing and improving the recruitment mechanisms of migrant workers.

In the UK, Seafresh Group's facility has become Stronger Together business partner and implemented their awareness and prevention methodology. Our labour provider is also applying Stronger Together methodology to mitigate risks in their recruitment process. We audit our labour providers and in Thailand we work with the Issara Institute for participating to the recruitment process in workers' country of origin and verify that conditions are fair and transparent. In our companies, we count with workers committees and works councils that discuss with company managers any concerns. We also use staff surveys and whistleblowing hotlines for detecting any issue and monitoring the level of satisfaction of employees. We have mechanisms in place for responding to issues with the appropriate involvement of company managers.

We also participate to industry exchange fora such as Seafish in the UK or the Issara Institute and the ILO in Thailand, for improving our awareness and understanding of risks of modern slavery. We provide training to our employees on ethical risks using materials from Stronger Together in the UK, or in collaboration with the Issara Institute in Thailand, for raising awareness of potential issues and capacity of appropriate reaction within our staff.

Approved by the Board of Directors of Seafresh Group on the 1st August, 2017



Lasse B. Hansen, CEO