

Modern Slavery Statement

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Seafresh Group (Holdings) Limited and other group companies (SFG)¹ during the year ending 31 December 2021 to prevent modern slavery and human trafficking in its business and supply chains in the UK and globally.

Introduction

This is our sixth Modern Slavery Statement and in the past 12 months we have consolidated our work of previous years to address issues of modern slavery and improved our management of risks. This statement describes our actions undertaken in 2021, both individually and collectively as a member or partner of an industry initiative and cross sectorial organisations. It reports some quantitative indicators that describe the situation of our supply chain. We also elaborate on goals identified as priorities to continue improving the way we address human rights and modern slavery in our operations and supply chains.

SFG's main activity is the sourcing, production and distribution of seafood and aquafeed products in several countries on a global scale. In the UK, SFG sources, adds value, packs and distributes seafood products for the retail, B2B and foodservice sectors. SFG also operates production facilities and employs people in other countries, outside of the UK, the largest being in Thailand, through its parent company Seafresh Industry Pcl.

SFG 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 throughout 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. Our statement also covers the risk of discrimination and child labour, which we define as work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and mental development². A significant improvement in 2021 was to develop a Human Rights Due Diligence framework to implement commitments made in our new Human Rights policy and achieve our objectives.

¹ Companies covered by this statement include Blue Earth Foods Ltd, Sea Farms Ltd, Sea Farms Nutrition Ltd, ProChaete Innovations Ltd, Mudwalls Farm Ltd and 44Foods Ltd based in the UK, and their seafood supply chain, including products from SFG parent companies, Seafresh Industry pcl and Belize Aquaculture Ltd, as well as third-party suppliers.

² Taken from the International Labour Organization (ILO)

Structure and Supply Chains

SFG is a holding company controlled by Seafresh Industry Pcl (based in Thailand), that includes Sea Farms Ltd, Blue Earth Foods Ltd, 44 Foods Ltd and Mudwalls Farm Ltd based in Redditch in the UK. SFG also includes Sea Farms Nutrition Ltd and ProChaete Innovations Ltd in the UK, and Sea Farms Nutrition Inc in the US, which develop, produce and distribute feed ingredients and specialty feeds for farmed aquaculture species. Sea Farms Inc in the USA imports and distributes seafood products for the retail market. Belize Aquaculture Ltd and Seafresh Industry pcl are producers and exporters of farmed shrimp. SFG sources seafood for the UK market from its own operations and also from third-party suppliers located in the UK, Europe, Asia, and the Americas.

SFG' seafood products include farmed and wild species of molluscs, crustaceans and to a very small extent, fish, originating from more than ten countries, including the UK. Warm water prawns are the main species produced and sourced by the Group in tropical countries, including Thailand, Belize, Honduras, Costa Rica, Vietnam, and Madagascar. Feeds used in farms include marine ingredients made from wild caught species. Such feed ingredient supply chains are complex, and in some cases, there is limited visibility on the origin of the fish and of the labour conditions on board of these vessels supplying the fish used to make feed ingredients.

Produce and other food ingredients are sourced from independent growers and suppliers in the UK mainly, or imported from other countries globally.

Policies & Governance

SFG has adopted the following policies which underpin our ongoing commitment to identifying and addressing any form of slavery or trafficking of workers:

Human Rights & Ethical Sourcing Policies

- state our commitment to maintaining transparency in our supply chains, assessing risks to human and labour rights, and remediating any situation of abuse that may be identified

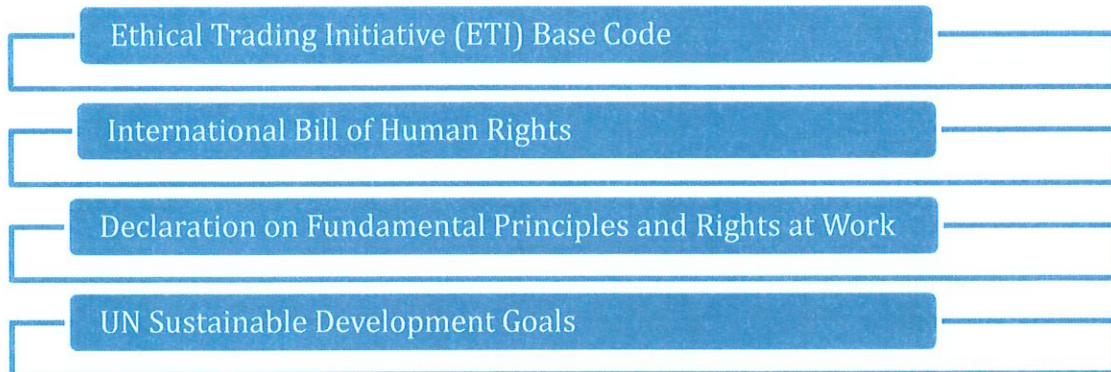
Sustainability Policy

- recognises the responsible management of social aspects as a key component of the overall sustainability of our business

Anti-Bribery and Corruption Policy

- sets the rules for an ethical conduct for all SFG employees when discharging their duties and functions

This policy framework is guided by the following:



Additionally, SFG subsidiaries have specific Human Resources policies and procedures relative to the country of operation and 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 principles of the ETI Base Code, and we expect the same commitments from all our suppliers. Our expectations on responsible environmental, social and governance practices have been documented in our Supplier Guiding Principles which set out the behaviour and standards we expect of our strategic suppliers. We are a member of SEDEX and we contributed to its initial development as a Board member.

SFG is committed to maintaining transparency of its supply chains and informing its customers of challenges and improvements. We are committed to tackling illegal, unreported and unregulated (IUU) fishing, which links in many cases with risks of slavery and human trafficking. We select sources of sea products that are certified to the Marine Stewardship Council (MSC) or MarinTrust in the case of feed ingredients, or suppliers who work towards these certifications.

SFG actively supports industry initiatives that aim to define and implement responsible practices in the fishing and aquaculture sectors. We collaborate with many UK and international organisations, both directly and through precompetitive working groups. We actively contribute to the development of certification standards and due diligence protocols. In 2017, SFG joined the Sustainable Seafood Coalition (SSC), an organisation that sets voluntary agreements on due diligence requirements for the responsible sourcing and labelling of seafood, based on legality and sustainability criteria, including social aspects.

SFG's Director of Sustainability is responsible for the establishment of policies and procedures for the management of ethical risks in the company's own operations and in the supply chain. Human Resources, Sustainability, Technical, Engineering and Supply Chain teams implement and manage the control measures in all Group operations and supply chains.

Risk Assessments

Following the adoption of a new Human Rights policy, we improved our risk assessment and assessed risks to specific human rights³ relevant to SFG activities and supply chain.

Human rights risks refer primarily to the potential or actual impacts of the business on rights holders, but impacts on the business operation and reputation can also be considered (United Nations 2011)⁴. Our risk assessment considers all possible implications with risks, either directly related to their cause in SFG operations, contributing to them through business activities or be indirectly linked to them throughout the supply chain.

Inherent risks are linked to the type of activity and the local context in the country of operation. Mitigation and control measures allow for reducing the probability and/or severity of inherent risks, resulting in what we call 'residual risks'.

A key preliminary condition to conduct risk assessments is to obtain visibility of the entire supply chain and collect the necessary data. We have two main ways of collecting information from suppliers: (i) the Sedex platform: we require all tier 1 suppliers to register on Sedex, complete the online self-assessment questionnaire (SAQ) and provide us with visibility of all their information, including ethical audits; (ii) we ask all tier 1 suppliers to complete our own questionnaires and templates to collect complementary information about their operation and their supply chain at least up to tier 4. The availability and accuracy of the information is verified through regular traceability exercises and supplier audits. We monitor the visibility and completeness of their information on management practices in the Sedex SAQ and other questionnaires (Table 1).

Table 1. Visibility of labour management information within SFG operations and its seafood supply chain.

Supply chain level	Operations	Visibility level and mechanisms
Tier 0	SFG production and distribution companies in the UK	100% via Sedex and audits
Tier 1	UK labour providers	100% via audits
	Direct suppliers (processors, manufacturers) of seafood products	100% via Sedex, questionnaires and audits
	Direct suppliers (processors, manufacturers) of other ingredients	100% via Sedex, questionnaires and audits
Tier 2	Farms (including SFG owned), Fishing vessels	100% via questionnaires, product traceability and audits
Tier 3	Hatcheries (including SFG owned)	100% via questionnaires, product traceability and audits

³ Based on rights listed in the International Bill of Human Rights and the Declaration on Fundamental Principles and Rights at Work⁴.

⁴ United Nations, 2011. Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework.

Supply chain level	Operations	Visibility level and mechanisms
	Feed mills	100% via questionnaires, feed traceability, audits and Sedex
Tier 4	Sources of fish ingredients used in aquafeeds	100% via questionnaires, feed traceability and audits

Identification and rating of inherent risks

All tier-0 and tier-1 (and some tier-2 & tier-3) supply sites are registered on Sedex and are risk rated based on the Sedex Radar risk assessment tool. Sedex Radar inherent risk scores are a function of country of operation, the activity sector and the commodity produced (Sedex 2020⁴). A numerical risk rating is generated to derive an 'Overall site characteristics risk score', which is used to categorise sites into low, medium or high risk (based on defined score ranges).

Inherent risk scores on specific human rights, including Health, safety & hygiene and Labour standards, which include Children & young workers, Discrimination, forced labour, Freedom of association, Gender, Regular employment, Wages and Working hours, are also assessed in the Sedex Radar tool. This allows for linking the different types of suppliers in particular countries with specific risks.

Inherent risks for other tier 1 UK suppliers that are not members of Sedex, such as labour and service providers, are evaluated based on available reports and materials on migrants and forced labour in the UK (such as Association of Labour Providers (ALP), Stronger Together and customers information). Moreover, Seafresh Group developed an internal decision tree for assessing risks with UK labour providers.

Inherent social risks of all producers in the seafood supply chain up to tier 4 are assessed based on the use of decision trees developed internally based on criteria identified and agreed by organisations that Seafresh Group is member of or collaborate with, such as the Seafood Ethics Action Alliance (SEAA). The decision trees are specific to land-based production facilities and fishing fleets separately due to the specific risk factors involved in the different types of activities and circumstances.

Facilities, sources of raw materials (fishing fleets and fisheries) and supply chains are rated based on our decision trees as Low, Medium or High risk. This assessment is based on country-specific information (such as the ratification of ILO conventions, the Corruption Perceptions Index, the Trafficking-In-Person (TIP) report⁵, and criteria relating to IUU fishing due to its common link with labour issues), supplier specific information from third-party assessments (such as certifications and Sedex) and our

⁴ Sedex, 2020. A guide to risk assessment in supply chains, <https://www.sedex.com/wp-content/uploads/2020/03/Sedex-Risk-assessment-in-supply-chains.pdf>

⁵ US Department of State Trafficking-In-Person report available at <https://www.state.gov/reports/2021-trafficking-in-persons-report/>

knowledge of their situation from both internal (questionnaires, visits, audits) and external (NGOs) information.

We consider all reliable reports from governmental agencies, NGOs or the media on specific issues or activities relating to seafood production in the specific country/region. We also establish partnerships with NGOs in countries of critical importance, such as Stronger Together in the UK, and 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. We review and update decision criteria every year to consider and integrate new tools and resources used in the seafood industry and the world of ethical sourcing. Consequently, the risk ratings of any particular supplier can vary year on year, and cannot be used as performance indicator.

The 2021 internal social risk assessment for SFG seafood supply chain resulted in a majority of medium risk sites. Most high-risk sites are at tier-2 level and above, and are aquaculture production facilities and fishing fleets in various countries.

The SFG facility based in Redditch, UK is rated medium risk because of countrywide risks raised in the UK relating to the use of agency labour and migrant workers. Globally, migrant labour is a common source of high risks throughout the seafood supply chain, especially in the fishing sector. This relates to risks of forced labour, employment standards, health & safety and work conditions, and access to grievance mechanisms.

As a result of the mitigation and control measures implemented by SFG these inherent risks have been significantly reduced.

Residual risk assessment

The understanding of inherent risks in combination with the knowledge of mitigation and control measures in place and the actual occurrence of issues allows for proceeding to the analysis of residual risks. The objective is to identify the most salient risks that the business can either cause (in its operations), contribute to (in the way it conducts business), or be linked to (in relation to suppliers' activities), as priorities for planning mitigation actions.

For the case of direct suppliers, the knowledge of mitigation and control measures comes from the Sedex SAQ and is summarised in the Sedex Radar site characteristics risk score (indicating the severity of impact), and audit records (indicating the probability of impact), which are reported in the Sedex Radar Risk Assessment Matrix. This is complemented by additional information on all suppliers throughout the supply chain collected by the SFG team through SAQs, site visits, supplier audits and other information provided by suppliers.

Residual risks are assessed in terms of the severity of their impact and the probability that they occur. Mitigation and control measures can reduce both the severity and the probability of any particular risk. Both severity and probability of impacts are scored

on a scale of 1 (low) to 3 (high) and multiplied to calculate a residual risk score from 1 to 9 and three risk levels: Low (1-2), Medium (3-4) and High (6-9).

No high residual risks were identified in 2021, thanks to mitigation measures in place in supply chains that carry high inherent risks. Where medium residual risks were identified steps are being taken to mitigate and, where possible, eradicate these risks.

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 questionnaires 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 staff periodically visit 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 in the self-assessment questionnaire, which allows for a risk rating generated by Sedex algorithm. All seafood direct supply sites are requested to conduct periodic SMETA audits, and audit reports and corrective actions are visible to us and our customers on Sedex. We follow up with suppliers to ensure that issues are addressed, and corrective actions are verified.

We also monitor the completion of corrective actions with suppliers submitted to ethical audits, and if needed we follow up with them. At the time of writing this statement, 88% of 289 non-compliances and observations raised during the 52 SMETA audits conducted in 2021 in SFG supply sites have been closed (Figure 1).

We also monitor how suppliers fulfill their own obligations of complying with modern slavery laws applicable to them. In 2021, all suppliers (6 of them) which were required by applicable national legislation to publish a modern slavery statement did so.

We are involved in a number of memberships that provide tools and mechanisms for identifying and mitigating risks in our own operations and our supply chain (Table 2). We are a member of the Global Dialogue on Seafood Traceability and therefore committed to implementing electronic traceability in our supply chain. We started in 2021 by conducting two pilots with our service provider and major suppliers, and developed templates to collect and link data from farm or vessel to imports of frozen seafood. We participate in industry exchange fora, such as the Seafood Ethics Common Language Group in the UK or the Issara Institute in Thailand, for improving our level of awareness and understanding of risks of modern slavery. In 2018 we joined the Seafood Ethics Action (SEA) Alliance, a group of UK seafood companies that decides on joint actions for mitigating ethical risks in the seafood industry. The SEA Alliance advocate governments and promote projects on the water to overcome ethical issues.

Figure 1. Number of non-compliances and observations either closed (blue) or open (orange) resulting from 52 SMETA audits conducted in 2021 in SFG supply sites.

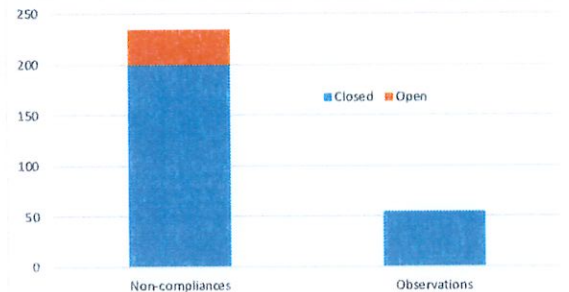


Table 2. SFG memberships that help to address human and labour rights.

Organisation name	Country	Purpose and benefits to SFG
Sedex	UK	Platform used for collecting and analysing information on employment practices of all suppliers, to help identify issues and risks on human and labour rights.
Stronger Together	UK	Provides materials and tools for raising awareness of employees on modern slavery and implementing prevention and detection management procedures.
Seafish	UK	Supports intelligence development through risk assessment tools, discussion groups such as the Seafood Ethics Common Language Group and certification of fishing vessels under the Responsible Fishing Scheme.
Seafood Ethics Action Alliance (SEAA)	UK	Stimulates collaboration with our peers within seafood companies for taking group actions for preventing ethical risks in the industry.
Sustainable Seafood Coalition (SSC)	UK	Sets voluntary rules for responsible sourcing of seafood products that we commit to comply with in all our supply chains.
Issara Institute	Thailand	Operates an independent call centre available to all our workers in Thailand; supports Seafresh in identifying and addressing ethical challenges internally and in our supply chain.
Seafood Task Force (STF)	Thailand	Bring the seafood industry, NGOs and the Thai government together to tackle issues and risks of modern slavery. Allows for agreeing concerted actions on recruitment and employment practices of migrant workers.
Global Seafood Alliance (GSA)	Global	Owns and manages the Best Aquaculture Practices (BAP) certification that covers employment practices and is used across our aquaculture supply chains, and the Responsible Fishing Vessel Scheme.
International Association for Women in the Seafood Industry (WSI)	Global	Raises awareness on the contribution of women in the seafood industry and promotes a more gender balanced industry.
Global Dialogue on Seafood Traceability (GDST)	Global	Develops standards for the electronic traceability of seafood products for improving the transparency and reliability of supply chains.

Organisation name	Country	Purpose and benefits to SFG
Sustainable Fisheries Partnership (SFP)	Global	Squid IUU working group formed out of the Squid Roundtable. The objective is to identify and address situations of IUU fishing in global squid fisheries.

All seafood from aquaculture in our supply chain is sourced from suppliers certified against BAP, ASC or GlobalGAP standards (Figure 2), which all cover employment practices and work conditions, and allow for reducing labour risks. In relation to feed ingredients of marine origin, we work with feed suppliers for selecting sources that are certified to MSC, MarinTrust or in the relevant improver programmes, which ensures traceability and allows for verifying the absence of IUU fishing. Also, it indirectly reduces risks of modern slavery as experience has shown that issues of illegal fishing and bad labour practices are commonly linked.

As part of the activities of the SEA Alliance, we have actively participated in the evaluation of PAS 1550:2017 “Exercising due diligence in establishing the legal origin of seafood products and marine ingredients”. The objective is to contribute to the improvement of procedures used in our industry to control the risk of illegal fishing, which is known to be linked to issues of human trafficking and worker exploitation. In relation to this engagement, we participated in 2021 in piloting the guidance for the implementation of PAS 1550:2017 in collaboration with the Pew Charitable Trusts, with the objective testing practicalities and refine recommendations to seafood businesses.

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

An example of action in the area is that we joined a working group coordinated by the Sustainable Fisheries Partnership formed to address issues of IUU fishing in global squid fisheries. This group has adopted a series of commitments to source squid from controlled fisheries and implement due diligence to avoid risks of link to IUU fishing. The group partnered in 2021 with the NGO C4ADs that uses technology for collecting intelligence data on fishing vessel activity across the globe to expose illegal fishing. Their data enable us to verify that no supply vessels are either involved in IUU fishing or owned by people or organisations involved in IUU fishing.

In Thailand, SFG is an active member of the Seafood Task Force (STF), 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. SFG views this work as a way to improve the traceability of feed ingredients of marine origin and to implement fair recruitment practices for migrant workers. In 2021 and as part of the STF activities, SFG implemented a new due diligence framework to ensure compliance with the STF Code of Conduct in the supply chain, including risk assessments, corrective actions and third-party audits.

SFG is also financially supporting a collaboration between the Seafood Task Force and the Thai Department of Fisheries for upgrading the vessel monitoring and control systems in Thailand, which covers employment conditions of crews. Initially, the STF has been focused on improving the vessel monitoring system and Port State Measures operated by Thai authorities to control risks of IUU fishing with the domestic fleet and fish imports, respectively. Their work has evolved to using automatic, satellite detection of labour risks to seafarers based on computerized analysis of vessel behaviour and historical data, as well as conducting training for port inspectors on the verification and investigation of labour aspects on fishing vessels.

Workers Voice mechanisms

We provide training to all our direct employees on ethical risks as part of the induction process, using materials from Stronger Together in the UK, or in collaboration with the Issara Institute in Thailand. This training aims to raise awareness on potential issues related to modern slavery and access to remedy within our staff, including the use of anonymous grievance mechanisms. This work extends to suppliers in Thailand, to raise their awareness of the issues and facilitate understanding and collaboration.

SFG companies and some suppliers have established workers committees and works councils, whereby worker representatives can discuss any concerns and suggestions for improvements with company managers. Worker representatives play a key role in facilitating the communication between their peers and the company. We also use staff surveys, whistleblowing hotlines and other proactive, direct communication channels for informing employees of changes and decisions that affect them. These mechanisms allow us to detect issues and monitor the level of employee satisfaction. We also explore the use of technology for improving communication. In the UK, we launched a phone app in June 2020 for sharing information with all employees, which also facilitates 2-way communication between company management and workers, allowing all employees to provide feedback or report grievances anonymously. Thanks to this mechanism, we have observed in 2021 a 50% increase in the number of near-misses, which greatly helps improving the safety of our operations. We have mechanisms in place for responding to complaints and issues with the appropriate involvement of company managers.

As mentioned above, SFG is a partner of the Issara Institute in Thailand. We work closely with the Issara team to promote the access of workers employed at our own facilities and by suppliers to Issara's independent call centre, analysing workers' complaints and questions received, and addressing issues identified. While activities on site could not take place in 2021 due to Covid restrictions, 2 major improvements were introduced in 2021:

- The launch of an online dashboard that provides direct visibility of issues raised by workers in our supply chain and remediation activities undertaken by employers to strategic partners (including SFG and retail customers),

- The addition of a “marketplace” to Issara’s phone app Golden Dreams, where employers can post job offers and allowing job seekers to apply directly, avoiding the need to use brokers who may take advantage of them in charging unjustified fees.

Responsible recruitment

In the UK, SFG’s site has implemented the Stronger Together awareness and prevention methodology. Our labour providers are requested to implement the same guidance, and we audit them regularly based on the audit checklist provided by the ALP to verify the application of procedures to mitigate risks of human trafficking in their recruitment process.

In Thailand, we work with recruitment agencies and the Issara Institute to participate in and control the recruitment process in workers’ country of origin and verify that recruitment conditions are fair and transparent. Our due diligence includes written agreements with recruitment agencies on professional and ethical services to jobseekers, including transparency of hiring conditions, pre-departure training and information, and remediation procedures. There was no recruitment of foreign workers from their home country in 2021, because of immigration and travel restrictions in place in Thailand, in response to the Covid19 pandemic. However, we continued our involvement in the Seafood Task Force training activities based on the Fair Hiring Initiative standard called “On the Level”, which provides step-by-step guidance and set of requirements for recruitment agencies to achieve internationally recognised responsible recruitment practices. Our recruitment agency in Myanmar attended all follow-up sessions and has strengthened its procedures of responsible and professional recruitment. Seafresh-Thailand has updated its recruitment policy and committed to recruit all new workers in 2022 under no-fee recruitment mechanisms.

Measuring progress

We have implemented internal KPIs to monitor the performance of our supply chain against objectives. We evaluate the effectiveness of measures taken to identify and prevent risks, and remediate issues based on indicators of risk levels and issues addressed at the various steps of the supply chain. One of our key objectives is that all our seafood sources achieve third-party certifications that validate the responsible management of fisheries and aquaculture production. In 2021, 100% of our farmed seafood sold in the UK was certified to a third-party scheme that covers employment practices (Figure 2). The 2 fisheries under a prospective FIP in 2020 were moved as comprehensive FIPs in 2021 (Figure 3). All other sources fisheries are either MSC certified or have responsible management measures in place (Figure 3).

Figure 2. Certification status of the SFG aquaculture supply chain to farm level as % of volume sourced in 2021 (blue) compared with 2020 (yellow) and 2019 (green). Many of our suppliers hold several certifications, hence why all 3 certifications cumulate to more than 100%

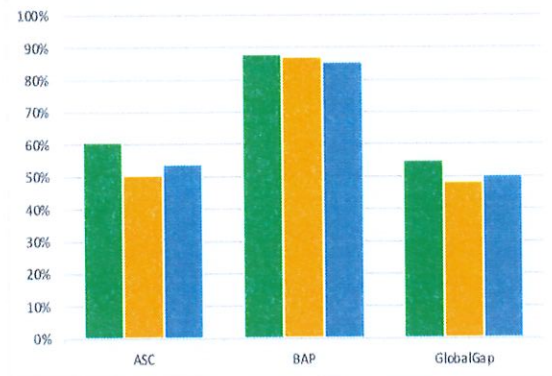
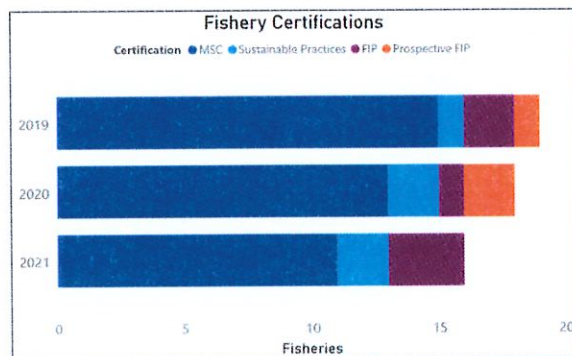


Figure 3. Certification status of SFG source fisheries in 2021 compared with 2020 and 2019.



Continual development

We will maintain and intensify our efforts in 2022 in three focus areas:

The development of tools and procedures for reducing and addressing ethical risks in our seafood supply chain, including contributing to industry initiatives.

We have reviewed and modified our supply chain risk criteria based on new knowledge of risk factors and the development of new assessment tools. We will keep verifying that our assessments of risks remain relevant and accurate.

As part of the activities of the SEA Alliance, we will continue our participation in piloting the guidance of PAS 1550:2017 “Exercising due diligence in establishing the legal origin of seafood products and marine ingredients”, with the objective of verifying the robustness of our due diligence process and consider recommendations for improvements.

We will continue expanding the scope of our implementation to electronic traceability in our seafood supply chain, and verify the capacity of sharing data in compliance with the Global Dialogue on Seafood Traceability (GDST) standard.

The improvement of due diligence activities, both internally and in our supply chain, and monitoring performance.

We will start implementing our Human Rights Due Diligence strategy within our operations and in our supply chain by:

- communicating our Supplier Guiding Principles to all strategic suppliers and seeking their commitment to them;
- updating our modern slavery prevention measures based on new Stronger Together guidance;
- intensifying internal audits to prevent Health & Safety risks: and
- amplifying the support to employees in financial difficulties through new solidarity mechanisms.

In Thailand, we will make use of the Issara online dashboard to follow up directly and immediately with suppliers and ensure they address any issues raised by workers. We will also work with Issara for expanding the scope of access to their call centre for workers in our supply chain.

We will continue improving the monitoring of relevant KPIs for evaluating the performance of our supply chain and measuring progress.

The progress of mechanisms to ensure the responsible recruitment of workers based on international principles and the access to grievance mechanisms.

The impact of Covid19 restrictions has resulted in a strong limitation of recruitment activities, and the priority in 2021 has been providing all employees with free access to vaccination while maintaining prevention measures to protect employees, including providing personal protective equipment, conditions for physical distancing and support for quarantines and home working. The situation now allows for recruiting new migrant workers in our Thai operations, and we will implement recruitment procedures under a no-fee policy. We will promote the use of Issara's "marketplace" on their phone app Golden Dreams, so that recruitment agencies post Seafresh job offers and allowing job seekers to contact the agency directly, avoiding the need to use brokers who may take advantage of them in charging unjustified fees.

In Thailand, we will also continue to implement the STF due diligence programme this year, to ensure compliance of our Thai supply chain with the STF Code of Conduct.

In our UK operation we will continue intensifying the use of our C-fresh app and continue collaborating with customers to test new technology solutions as a way of collecting feedback from workers.

This statement was approved by the Board of Directors of Seafresh Group (Holdings) Limited on the 11th August, 2022.



Lasse B. Hansen, CEO