

Modern Slavery Statement

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.

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 2023 to prevent modern slavery and human trafficking in its business and supply chains in the UK and globally.

This statement was approved by the Board of Directors of Seafresh Group (Holdings) Limited on 21st June 2024.



Lasse B Hansen

Structure & Supply Chains

SFG is a privately owned food manufacturing business that sources seafood for the UK market from its own operations and also from third-party suppliers located in the UK, Europe, Asia, Oceania and the Americas.

SFG products include farmed and wild seafood sustainably sourced from a global supply chain including the UK, and value-added food products manufactured in the UK.

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

- states our commitment to maintaining transparency in our supply chains, assessing and mitigating 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 sustainable development of our business

Anti-Bribery and Corruption Policy

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

This policy framework is guided by the following:

Ethical Trading Initiative (ETI) Base Code

International Bill of Human Rights

Declaration on Fundamental Principles and Rights at Work

UN Sustainable Development Goals

Additionally, SFG subsidiaries have specific Human Resources policies and procedures relative to the country of operation 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's Director of Sustainability is responsible for the establishment of policies and procedures for the management of ethical risks in SFG's own operations and in the supply chain. Human Resources, Sustainability, Technical, Engineering, Production and Supply Chain teams implement and manage the control measures in all Group operations and supply chains.

Risk Assessments

Following the adoption of our Human Rights policy, we improved our risk assessment and assessed risks to specific human rights² relevant to SFG's 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 2011³). Our risk assessment considers all types of risk whether direct or indirect.

A key preliminary condition to conduct risk assessments is to obtain visibility of the entire supply chain by collecting the necessary data. We do this by requiring all tier-1 suppliers to (i) register on Sedex, complete the online self-assessment questionnaire and provide us with visibility of all their information, including ethical audits; (ii) complete our questionnaires and templates to collect complementary information about their operation and, in the case of seafood suppliers, 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.

Identification and rating of inherent risks

All tier-1 supply sites registered on Sedex 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). Inherent risk scores and site characteristics risk scores for both health, safety & hygiene and labour standards (including children & young workers, discrimination, forced labour,

freedom of association, gender, regular employment, wages and working hours) contribute to the calculation of an average 'Human Rights' risk score, which is used to categorise sites into low, medium or high risk.

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).

Inherent social risks of all supply sites and operations 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 SFG is member of or collaborate with, such as the Seafood Ethics Action Alliance (SEAA). Our decision trees are specific to land-based production facilities and fishing fleets separately due to the specific risk factors involved in the two different types of conditions and activities. Facilities, sources of raw materials (fishing fleets, fisheries) and supply chains are rated based on our decision trees as low, medium or high risk.

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 us to analyse residual risks. Such knowledge derives from independent assessment and audit reports, supplier visits and participation in collaborative industry initiatives. The objective is twofold, (1) to assess the level of reduction of inherent risks, and (2) 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.

The review of mitigation actions implemented within SFG operations concluded that residual risks that SFG can either cause or contribute to, are low. Residual risks that SFG is linked to range from low to high depending on the type and country of operation.

Due diligence

Supply chains

All seafood from aquaculture in our supply chain is sourced from suppliers certified against BAP, ASC, or GlobalGAP standards, which all cover employment practices and work conditions, and contribute to reducing labour risks in production facilities. In relation to feed ingredients of marine origin, we work with feed suppliers for selecting sources that are certified to MSC, MarinTrust or the relevant improver programmes, which ensures traceability and allow for controlling risks of link to IUU fishing. It

indirectly reduces risks of modern slavery as experience has shown that issues of illegal fishing and bad labour practices are commonly linked. All wild-caught seafood in our supply chain is sourced from fisheries that are either MSC certified, in a Fishery Improvement Project (FIP) or sustainable management practices are in place.

We continuously improve our internal due diligence procedures following guidance of the PAS 1550:2017 standard “Exercising due diligence in establishing the legal origin of seafood products and marine ingredients”. Where necessary, we engage with NGOs and other organisations for improving our level of oversight of supply chains and better mitigating risks.

Our memberships or partnerships of the organisations set out in Table 1 help us to address human and labour rights, both individually and collaboratively.

An example of action in the area is the work done by the Global Squid Supply Chain Roundtable (SR) under the coordination of the Sustainable Fisheries Partnership (SFP). This group has adopted a series of commitments to responsibly source squid and improve the sustainability of fisheries and implement due diligence to avoid the risk of IUU product entering the supply chain. The SR partners with NGOs and external expertise to give advice on tools to help with due diligence (e.g. the Global Fishing Watch Vessel Viewer). Human rights specialists are also partnered with to give human rights due diligence training.

In Southeast Asia, 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 in the supply chain. SFG views this work as a way to improve the traceability of feed ingredients of marine origin and to support the implementation of fair recruitment practices for migrant workers. As part of the STF activities, SFG contributes to the implementation of a 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 covering the whole supply chain.

Table 1. SFG memberships and partnerships 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.

Organisation name	Country	Purpose and benefits to SFG
Seafish	UK	Supports intelligence development through risk assessment tools, discussion groups such as the Seafood Ethics Common Language Group. Developed the Responsible Fishing Vessel 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 and labelling 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, Vietnam, India and Indonesia	Bring the seafood industry, NGOs and the local governments together to tackle issues and risks of modern slavery. Allows for conducting 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.
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.
Sustainable Fisheries Partnership (SFP)	Global	Supplier Roundtables address sustainability issues in global fisheries and support the development of improvement projects which include labour aspects.

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 within our workforce on potential issues related to modern slavery and access to remedy.

We have mechanisms in place for responding to complaints and issues with the appropriate involvement of company managers. 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. 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 have our internal C-fresh phone app for sharing information with employees and allowing them to provide feedback or report grievances anonymously. Thanks to this tool in combination with other communication channels and inspection mechanisms,

we have observed a significant improvement in the reporting of near misses, which greatly helps us improve the safety of our operations.

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.

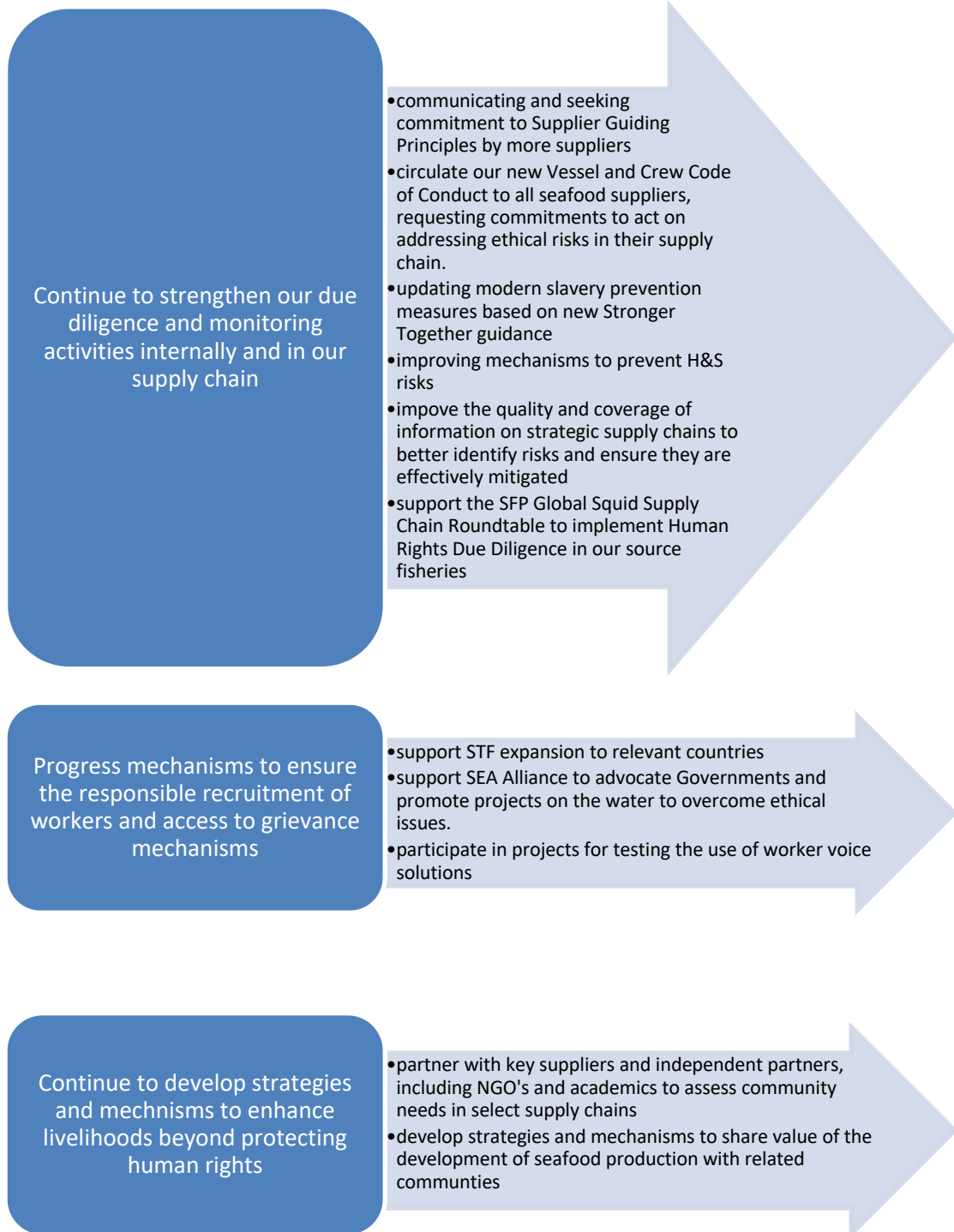
In Thailand, we work with recruitment agencies and the Issara Institute to control the recruitment process of migrant workers and ensure that recruitment conditions are fair and transparent. All migrant workers are recruited based on the employer-pay principle, without paying fees. Our due diligence includes written agreements with recruitment agencies that detail respective responsibilities to provide professional and ethical services to jobseekers, including transparency of hiring conditions, pre-departure training and information, and remediation procedures.

Key Performance Indicators



Next Steps

We will maintain and intensify our efforts in 2024 in three focus areas:



Continue to strengthen our due diligence and monitoring activities internally and in our supply chain

- communicating and seeking commitment to Supplier Guiding Principles by more suppliers
- circulate our new Vessel and Crew Code of Conduct to all seafood suppliers, requesting commitments to act on addressing ethical risks in their supply chain.
- updating modern slavery prevention measures based on new Stronger Together guidance
- improving mechanisms to prevent H&S risks
- improve the quality and coverage of information on strategic supply chains to better identify risks and ensure they are effectively mitigated
- support the SFP Global Squid Supply Chain Roundtable to implement Human Rights Due Diligence in our source fisheries

Progress mechanisms to ensure the responsible recruitment of workers and access to grievance mechanisms

- support STF expansion to relevant countries
- support SEA Alliance to advocate Governments and promote projects on the water to overcome ethical issues.
- participate in projects for testing the use of worker voice solutions

Continue to develop strategies and mechanisms to enhance livelihoods beyond protecting human rights

- partner with key suppliers and independent partners, including NGO's and academics to assess community needs in select supply chains
- develop strategies and mechanisms to share value of the development of seafood production with related communities

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 44 Foods 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 Based on rights listed in the International Bill of Human Rights and the Declaration on Fundamental Principles and Rights at Work³

³ United Nations, 2011. Guiding Principles on Business and Human Rights: Implementing the United Nations 'Protect, Respect and Remedy' Framework.

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>