

Modern Slavery Statement

2018/19



Our Business & Supply Chains

The company has an annual turnover of £58 Million, employing around 350 people based at its Head Office and manufacturing sites at Whitby, England, and Kilkeel, Northern Ireland.

Whitby Seafoods is a manufacturer and supplier of frozen and chilled seafood products to retail and foodservice businesses in the UK.

Over 80% of the fish we source comes from waters around the British Isles. We are supported by a partner in Vietnam for a proportion of our processing.

Other raw materials are sourced in smaller quantities from suppliers in China, Vietnam, Malaysia, 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 2018.

...

£58 MILLION
TURNOVER

350 PEOPLE
DIRECTLY EMPLOYED

2 SITES

Sustainability Values

Sustainability

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. Currently our focus is on;

- Sourcing responsibly.
- Promoting and supporting ethical behaviours for the people 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 240 direct suppliers across all our raw material and other operational procurement. We recognise that many of our suppliers have suppliers, both material and labour. Our work has focused 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

Business in the Community
www.bitc.org.uk

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.



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 employees 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 employees. In 2018 we have encouraged our highest risk land based operations to demonstrate to us that

they have applied the ETI base code within their operations.

We see this as a step towards improving the process of recruitment to remove the chance of abuse at this early stage.



Our Partners;



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 catch area as well as the country the fish preparation takes place. References are made against Seafish Country Profiles¹ as well as the US trafficking persons report 2018². The company has prioritised the sourcing of seafood as its main focus due to the nature and reported challenges in seafood sourcing.

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.
- Working towards, or achieved credible certification (e.g. ASC, Fairtrade, SMETA).
- Ability to demonstrate compliance with international law.

The most challenging aspect of seafood supply is that the primary source of supply comes from fishing boats which spend a large proportion of time out of sight. Policing these boats and evidencing ethical traceability is an industry wide challenge.

In recognition of the complex ties of the fish supply chain we participate in the Fishermen's Welfare Alliance. The Fishermen's Welfare Alliance represents the fish supply chain through catching sector representatives, processors and retail / food service business and organisations with health, safety, environmental and welfare responsibilities. By working together, we achieve transparency through the key stakeholders across the UK and approach all issues in a collaborative way ensuring proactive and responsible actions are taken whilst reducing the chance of unintended consequences.



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 cease of 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.

<http://www.seafish.org/responsible-sourcing/ethics-in-seafood/assessment-of-ethical-issues>

<https://www.state.gov/j/tip/rls/tiprpt/>

The most prevalent accreditations for Whitby Seafoods' business model that include ethical approaches to labour outside UK fishing are;

- A Sedex audit undertaken by a 3rd party.
- Aquaculture Stewardship Council (ASC) accreditation.
- An audit conducted by Whitby Seafoods.
- A human rights impact assessment by an independent, competent 3rd party.

Sedex

The Sedex tool allows Whitby Seafoods to view supplier self-audit 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. In 2018, Whitby Seafoods upgraded our Sedex membership to allow us to use the wide range of tools available within the

system to improve visibility and target action.

Whitby Seafoods Ltd. is a member of Sedex (www.sedexglobal.com). Sedex is home to one of the world's largest collaborative platform for buyers, suppliers and auditors to store, share and report on information quickly and easily. The platform is used by more than 43,000 members in over 150 countries to manage performance around labour rights, health and safety, the environment and business ethics.

By way of example, the Whitby Seafoods site have undertaken an independent 3rd party Ethical Audit in May 2018 against the SMETA (Sedex Members Ethical Trade Audit) standard. We have committed to repeating this exercise every 2 years as a minimum. In 2019, we plan to carry out a SMETA audit at our Kilkeel site.



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.

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.

Labour provider audits have been conducted by the Whitby

HR team against internal standards without any significant deviations.

We have continued to inspect our suppliers overseas manufacturing sites as part of our supplier relationship programme. Our New Business Development Director inspected a Malaysian direct supplier factory and a supply site in Spain. Members of our senior management team visited a manufacturing site in Germany as part of expanding our product portfolio. No evidence of Modern Slavery was observed during

the visits to any 3rd party operations.

Our primary Vietnamese processing partner was inspected by our Managing Director, Supply Chain Director and Head of Technical. This is a long standing relationship spanning a number of years during which a number of audits have been conducted.

No evidence of human rights violations were observed and we continue to support the workforce and community of this key operational partner.



Training and Awareness

Our employees and suppliers play a pivotal role in helping us to ensure that modern slavery violations do not take place in our business or supply chains.

Over the last year employees from within the business have taken part in a number of training or awareness improving activities.

These include;

- Awareness training using the stronger together toolkit.
- Ongoing development of a system to assist boat owners to meet human rights issues for new UK legislation.
- Feedback on the new version of the Responsible Fishing Scheme (RFS) for enhancement of the new scheme when it is rolled out as a global standard.
- Training in the Whistleblowing Procedure.



Moving Forward

As outlined in this statement, we are building a robust system to assist us in tackling the challenges associated with modern slavery in our supply chain. We have identified our key first tier suppliers and we plan to work with these partners, using risk assessment, to take targeted action where we see most risk.

We plan to continue to build on our internal policies where we see gaps against best practice and put support mechanisms in place to encourage potential victims to make themselves known. Our plans include the enhancement of remediation protocols should we find evidence or risk of abuse.

We will continue to educate the business internally and within our supply chain. As we cast our net wider we will train more managers with the Stronger Together toolkit and attendance at workshops. As ILO convention 188 is passed into UK law, we will continue to work with our UK nephrops suppliers to understand if any help is needed for them to support the boat owners from which they buy to adopt best practice. This will give us visibility of where residual risks lie from which we can initiate action.

Measuring Success

We assess the effectiveness of our systems with key measures. Last year we published some key measures and this year we have added some relevant sub measures to track progress. These measures will be monitored throughout 2019 and reported on annually.

	2018 Result	Comments
1. Number of "Red rated" suppliers on the SEDEX platform. 1a. % of Amber rated suppliers on the SEDEX platform.	0 65%	
2. Number of UK boats mapped as compliant against ILO c188. 2a. % of nephrops boats in our supply chain registered on the Safety folder website.	0 22%	ILO c188 does not come into UK law until January 2019.
3. Number of proactive interventions made with respect to modern slavery.	34	Number of ILOc188 statement letters to scampi suppliers within our supply chain.
4. Number of re-active interventions made with respect to modern slavery.	0	

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. February 2019



Whitby Seafoods Ltd., Fairfield Way, Whitby, North Yorkshire, YO22 4PU
www.whitby-seafoods.com info@whitby-seafoods.com 0800 7316596