

## **SLAVERY AND HUMAN TRAFFICKING DISCLOSURE STATEMENT**

We are aware that we will be purchasing from countries where slavery is taking place, and that labour abuse may be hidden and difficult to expose. We will take all reasonable steps, as outlined below, in a process to ensure that our products are sourced only from those suppliers that we trust to maintain satisfactory working conditions, pay a fair wage, and comply with the producer country's labour, health and safety laws.

### **OUR ORGANISATION**

Icelandic Seachill is based in Grimsby UK, where we have three operating factories producing chilled and frozen fish and seafood. Our owners, the Icelandic Enterprise Investment Fund, are based in Reykjavik, Iceland. More detailed information is presented at <http://icelandic.is>

### **OUR PRODUCTS AND SUPPLY CHAINS**

We supply fish and seafood products to the UK own label retail market and we own the global brand "The Saucy Fish Co. ". This involves global supply chains from both wild caught and farmed sources.

### **OUR CORPORATE SOCIAL RESPONSIBILITY PROGRAM**

Icelandic Seachill are leaders in our sector with a broad social and environmental program under the banner of "Quality Naturally". The 3 elements of which are Sustainable supply chains (eg. renewable fish stocks), Ethical supply (treating all the workers in our supply chains fairly) and Trusted supply chains (Authentic products that are fully traceable). We use this banner to bring focus and raise awareness both internally and externally of these topics.

### **OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING**

We are committed to a process of safeguarding against modern slavery or human trafficking in our supply chains or in any part of our business. Icelandic Seachill ethical policies are based on the Ethical Trading Initiative codes (<http://www.ethicaltrade.org/>). Our Policy on Socially Responsible Trading and Avoidance of Slavery and Human Trafficking includes a commitment to acting ethically and with integrity in all our business relationships. These commitments are also supported by our policies on Whistleblowing, Bribery & Corruption, Equal Opportunities and Ethical Business Conduct.

### **ASSESSING AND ADDRESSING THE RISK OF SLAVERY AND HUMAN TRAFFICKING**

We have formed a cross functional team to develop policies and procedures, organise appropriate staff training, create and use a risk assessment framework, and formulate a strategy of engagement.

We actively engage with our suppliers and customers to create tools to monitor supply chains for compliance and improve our knowledge and capability to improve them. This includes

- Membership of Stronger Together
- Audits of labour providers to Icelandic Seachill.
- Traceability of our supply chains back to the origin of all raw materials.

- Membership of SEDEX, the largest global collaborative database, to link to our suppliers and share audits and report on Labour Standards, Health & Safety, Environment, and Business Ethics and drive continuous improvement.
- Supporting the development of common Ethical Risk Assessments (ERA's) together with retailers, food manufacturers, and NGO's.
- Our ethical compliance team uses our ERA as a critical element in our supplier approval process and to decide if an independent social compliance audit is required. Any actions identified in the ERA or from audits are discussed with the supplier and implemented.
- Our engagement with fishing fleets is based on implementation of the International Labour Organisation (ILO) Work in Fishing Convention (2007) – C188.
- A central role (board and technical committee) in the development of the Responsible Fishing Scheme (RFS) a UK based fishing vessel auditing programme that includes both social and safety standards. The intention is to develop RFS into an International standard for fishing vessels.
- Collaboration with likeminded seafood companies as a member of the Food and Drink Federation (FDF) and as founding members of the UK Seafood Alliance.

We recognise the limitations of relying on ethical audits to identify deliberate labour abuses so our focus is on selecting trusted suppliers with whom we have an open and transparent dialogue about workforce recruitment, terms, hours, and pay.

Should we find any evidence of slavery or other labour abuses within our supply chain we will seek expert advice on how to address the issues in the best interests of the people affected, to offer support to improve their circumstances, and to avoid any reoccurrences.

## **TRAINING AND AWARENESS OF OUR PEOPLE**

To ensure understanding of the risks of modern slavery and human trafficking in our supply chain and business, we have provided the following training :

### **Training events attended**

- The Sedex Conference on Modern Slavery – attended by a senior Technical Manager
- 2 Stronger Together training courses– attended by the Human Resources Manager
- ETI Modern Slavery Workshop– attended by senior Technical Manager
- CIPS (Chartered Institute of Procurement & Supply) – Modern Slavery Act Compliance Training – attended by a Senior Fish Buyer and a senior Technical Manager
- Cooperative and ETI joint training course – attended by a senior Technical Manager

### **Conferences & forum engagement**

- Founder members of and attendance at 5 Seafish Ethical Common Language Groups
- FDF Employment and Skills Forum – attended by the Human Resources Manager
- Modern Slavery briefing in Parliament - attended by a Director
- Home Office Transparency in Supply Chain event – attended by senior Technical Manager
- Modern Slavery Conference – attended by senior Technical Manager
- House of Lords event – attended by a senior Technical Manager
- SEDEX members conference – attended by senior Technical and the Human Resources Manager
- Seafish Modern Slavery Workshop – attended by 2 Technical Managers
- Guardian and Seafish – Slavery in Seafood supply chain event – attended by senior Technical Manager

### **Board Training**

A Board briefing was delivered by the Human Resources Manager and a Technical Manager that had received the above training. This included an analysis of the risks of modern slavery in our own labour supply and those in our supply chains. A discussion on how to address the risks has been undertaken by the board and approval of this statement is a direct result of this.

### **Staff briefings**

Awareness training of the issues is included in all new staff inductions including advice on where to go for help if they are victims of abuse. These are reinforced and supported by advice on noticeboards at each site including information about Stronger Together.

### **MEASURING OUR PROGRESS**

We have established some key performance indicators (KPIs) as follows

- Completion of Supply Chain Ethical Risk Assessments
- Supply chain factories registered on SEDEX with completed SAQ's.
- Where required the completion of social compliance audits with agreed action plans.
- Modern Slavery Awareness Training plan completion

For subsequent years we plan to introduce a measurement of fishing vessels certified to RFS and farms that have been certified to a scheme that includes social audits.

**Icelandic Seachill will continue to take a lead in a collaborative approach to tackling Modern Slavery, working with organisations to raise awareness and to ensure fair and safe working conditions throughout our supply chains and to raise standards within our industry in general.**

This statement is published in compliance with section 54 of The Modern Slavery Act (2015).

This statement was approved by the Board of Directors of Icelandic Seachill and signed on their behalf by

A handwritten signature in black ink, appearing to read 'Simon Smith', written over a horizontal line.

Simon Smith

CEO

March 2017