



NEW ENGLAND SEAFOOD INTERNATIONAL LIMITED

Modern Slavery Statement 2022

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It provides detailed information on our business activities and commitments to mitigate against the risks of modern slavery in our business and our supply chains and makes clear the steps we took in our financial year 1st January 2021 to 31st December 2021.

Introduction

Despite the existence of global laws and systems, the sad reality is that people all around the world remain vulnerable to modern slavery and human trafficking. New England Seafood International (NESI) respects all human rights and we do not tolerate Modern Slavery in our organisation or in our supply chains. This is our fifth Modern Slavery Statement in accordance with the Modern Slavery Act 2015.

Our business and supply chains

NESI is the UK's leading supplier of premium wild and farmed fish and seafood into the UK market. Our product range consists of species that are sold under many major supermarkets' own labels, as well as our own brands 'Wild Fish Discovery', 'Fish Said Fred' and 'LEAP'. We also supply products to well-known foodservice brands in both the UK and in Europe. Our core business purpose is 'to enhance lives through fish' so that all those, from the fishers and farmers, to our employees, the communities in which we operate, and the consumers that we serve, benefit from NESI's business activities.

The business was founded in 1991 and was a privately owned business up until 30th October 2020 when the business was acquired by Sealaska, a for-profit Alaska Native Corporation. Sealaska corporation was founded in 1972, when the Alaska Native Claims Settlement Act (a treaty between the US government and the Native tribes of Alaska which settled a long-standing dispute around land ownership rights) created 12 Native corporations. Sealaska is owned by 23,000 Tlingit, Haida and Tsimshian shareholders with more than 10,000 years of ancestral ties to the oceans, forests, and communities of Southeast Alaska. It has a mission to protect its communities' greatest and most important resources – the oceans, forests, and people of Southeast Alaska. Profits from the group are invested to better the lives of those communities and help create a healthy and prosperous future.



We source seafood, ingredients, and other materials from around 33 countries across five continents.



We have three office and processing sites (one in Grimsby and two Chessington), with a hugely diverse workforce, employing just over 600 people with over 30 different nationalities.



We pride ourselves on taking a partnership approach with our suppliers; many of whom have been our suppliers since the business was founded 31 years ago.



We do not own or operate any fishing vessels.

Governance

Our ethics vision very much builds on our core business purpose, 'to enhance lives through fish by protecting the human rights and ensuring decent working conditions for all those that work in or for



our business'. With this in mind, our modern slavery strategy is approached cross functionally. In February 2021, we announced a newly formed Corporate Social Responsibility (CSR) team, centred around the delivery of our collective CSR vision. NESI's Ethics Manager transitioned into a role heading up the Social Responsibility pillar of the CSR team, giving focus to progress the highly important and valued work on driving ethical improvements within our supply chains. Our modern slavery strategy at a site level continues to be led by the HR teams at our sites.

Finally, our internal cross functional Ethics Committee, that was set up in September 2018 to take a business wide approach to modern slavery, continued to meet throughout the year, three times within the reporting period. This group is chaired by NESI's Head of Social Responsibility and has representatives from all of our major business functions.

Our Policies

We have a variety of policies in place aimed at protecting our own employees and suppliers from the multi-faceted aspects of modern slavery:

- Equal Opportunities and Diversity at Work policy - applicable to all employees
- Disciplinary policy - applicable to all employees
- Anti-bribery policy - applicable to all employees
- Navex Global – Independent Whistleblowing hotline, available in multiple languages and accessible 24 hours a day
- Grievance Policy and procedure - applicable to all employees
- Trading Charter – applicable to all employees and suppliers
- NESI Ethical Policy – applicable to all employees and suppliers

One of our five core company values is “respect for the environment, natural resources and people” and our social requirements are consistent with the ETI Base Code. We believe firmly in fair, open, and honest trading and always seek to develop long-term partnerships with our suppliers who are prepared to commit to our values. We require our suppliers to demonstrate (through audit) fair and ethical treatment of their employees and other stakeholders as well as compliance to national regulations.

We understand the benefit that our policies and risk assessments give to help tackle modern slavery and we acknowledge the need to regularly review and update policies to ensure that they are adapted to reduce the risks to our business.

Collaboration and External Engagement

We recognise that tackling modern slavery on a global scale is an issue that no business can resolve alone. As such, we participate in a variety of multi-stakeholder initiatives which enables us to increase and leverage our influence within our industry and across our supply chains.

We have been an 'AB' (Buyer/Supplier) member of Supplier Ethical Data Exchange (Sedex) since 2011, this being a pre-requisite to supplying our customers. Sedex also allows us to conduct an effective risk analysis of our supply chains.

We sit on the Steering Committee of the Seafood Ethics Action Alliance (SEAA), and we are part of the Seafood Ethics Common Language Group (SECLG). Both groups, run by Seafish, focus specifically on the provision of human rights at sea. In April, the SEAA was successfully awarded a grant from the David and Lucile Packard Foundation which will support our work to increase industry leadership and encourage positive change in human rights issues across the seafood supply chains of UK companies.





We became members of the Food Network for Ethical Trade (FNET) in February 2020. FNET was established in 2016 by a number of major UK food companies to improve human rights in global food supply chains through a common approach to managing ethical trade.

Following on from two years of public consultation, FisheryProgress launched their 'Human Rights and Social Responsibility Policy' on 12th May. The objective of the policy is to help Fishery Improvement Projects (FIPs) identify and reduce the risk of human and labour rights abuses in their fisheries, and to increase transparency around the efforts FIPs are taking to address human and labour rights risks. Following the launch of the policy, FisheryProgress held a series of webinars to introduce the policy to FIPs and other stakeholders. Owing to our support and engagement during the development of the policy, NESI were invited to speak at one of the webinars where we outlined that we see the policy as an enabler to help us gather information on key interest areas relevant to our business and our customers. Finally in June, we were invited to join FisheryProgress's Social Advisory Committee with the aim of serving as expert advisors for FisheryProgress on questions and issues that arise during the review of the FIPs' social reporting and as the site handles allegations, along with building support within the seafood sector for the long-term goal of mandatory human rights due diligence for all fisheries.

Following on from the launch of the Responsible Fishing Vessel Standard (RFVS) in June 2020, we continued to be involved in the Technical Committee throughout 2021 to discuss any issues that may arise from the audits conducted or where additional areas may need to be discussed to protect the integrity of the programme.

In addition to the above memberships / committees, we provided feedback into the following public consultations and assessments throughout 2021:

- In January we fed back on the wording and KPIs of the Global Tuna Alliance's (GTA) 5-year strategy, the [2025 Pledge towards Sustainable Tuna](#) (25 PST), to ensure that the Social Responsibility section was fit for purpose. As a GTA Partner who has committed to implementing the 5-year strategy, we are pledging to make demonstrable progress against three commitments: transparency and traceability; environmental sustainability and social responsibility. In December we participated in the partner survey where we disclosed our progress against the 5-year strategy for the first time.
- In March we fed back to the 60-day public consultation period for the Fairness Integrity Safety Health Standard for Crew (FISH Standard). The FISH Standard provides a voluntary, independent, and accredited third-party certification programme for labour practices on vessels in wild-capture fisheries around the globe. Version 1.1 of the FISH Standard was launched on 14th April.
- Our wild seafood suppliers who are Marine Stewardship Council (MSC) certified have been required by MSC, since August 2019, to report publicly on the measures they are taking to address forced and child labour via self-disclosure statements, and where applicable, to complete a third-party labour audit, or since 2021, complete a self-assessment. The MSC invited NESI to brainstorm social policy ideas and provide feedback on proposed changes to their policy requirements in December.

Risk assessment, prevention, and mitigation

We risk assess, prevent, and mitigate risk of modern slavery across our own sites in the following ways:

- Both of our sites were due to have SMETA audits in November/December, but due to Covid these audits were delayed and will instead be planned for early 2022.





- Sedex’s forced labour indicator tool which was developed in May 2021 showed that there were no forced labour risks at our two sites, nor in our supply chain.
- Both of our sites have active Site Engagement Forums (SEF) – and all SEF members have completed their online Stronger Together course on ‘Tackling Modern Slavery – UK Businesses’. The SEF at Chessington is made up of 7 representatives, covering all shifts, and the group meet fortnightly. The SEF at Grimsby is made up of 7 representatives, covering all shifts and the group meet monthly.
- All labour providers used by both our sites hold a GLAA licence and are audited as a minimum every 6 months. One aspect of the audit involves conducting worker interview with agency workers. In addition, to enhance our due diligence efforts, we send surveys to the agency workers, asking them about their onboarding experience with the labour provider, and we also survey the agencies themselves to ensure they are compliant with their own processes.

We risk assess, prevent and mitigate risk of modern slavery in our supply chains in the following way:

- We require our suppliers to become members of Sedex and to provide us with visibility of their SAQ and audit information to help us understand and mitigate risk in our supply chains. We actively monitor supplier Sedex performance and share this information with relevant people within the business.
- We continue to work collaboratively through our FNET membership and in 2021 we took part in the following working groups: recruitment fees; ethical engagement; risk assessment and mitigation and raw materials.
- NESI recognises the value that third party certification programmes such as the MSC and ASC play in our society in helping our consumers recognise and buy sustainable seafood. We also believe that such certification standards have a shared responsibility in supporting global efforts to eradicate forced labour in fisheries and seafood supply chains.
 - That is why NESI, along with other SEA Alliance Steering Committee members, met with the MSC in October to discuss areas of shared interest and potential collaboration projects with regards to developing MSC’s approach to human rights and labour issues in the seafood sector.
 - On the aquaculture side, we are encouraged to see that some of our suppliers have undertaken the GLOBALG.A.P Risk Assessment on Social Practice (GRASP). GRASP is a voluntary, farm-level social/labour management tool for global supply chains which allows producers to assess, improve and demonstrate their responsible social practices through four main topics: workers voice, human and labour rights information, human and labour rights indicators and child and young workers protection.
- Recognising that there was a need for a consistent approach to assessing human rights risk at a fishery level across UK industry, NESI became part of a small working group made up of SEA Alliance Steering Committee members working on developing a Fisheries Risk Rating Tool. The overarching purpose of the risk rating tool is to contribute to individual businesses human rights due diligence processes, enabling businesses to identify potential human rights risks in their supply chains (based on an agreed set of indices and criteria) and prioritise where to focus their efforts to drive improvements. The risk rating tool enables users to apply a consistent methodology, avoiding duplication of data collection and facilitating common practice. NESI presented this ambition to wider SEA Alliance members on a webinar in November and the plan is to encourage wider industry uptake by getting MOUs in place with other UK industry groups including the Global Tuna Alliance; the Sustainable Seafood Coalition and FNET in 2022.
- We actively take part in workshops, webinars and events that are organised by our customer base:
 - In February, NESI volunteered to provide feedback to the development of a customer’s thorough human rights due diligence guidance document. As a follow up to this, we presented a case study on a webinar to other suppliers on our cross functional approach to ethics and modern slavery.
 - In October, one of our customers held an event for their suppliers, entitled “Managing Modern Slavery Risks in 2021”. The event touched on growing risks of modern slavery and



future trends, as well as hearing from speakers giving an industry perspective on how to take practical action. Insights from this event were shared with relevant people inside our business.

- In August, NESI's Head of Social Responsibility enrolled on SGS's Social Systems Auditor/Lead Auditor training course, with the aim of finishing the weeklong course with better knowledge and skills required to perform audits of an organisations conformance with social responsibility specifications. The skills acquired on this course have helped us to better risk assess, prevent, and mitigate risk of modern slavery in our supply chains.

In March, we completed Stronger Together's Progress Reporting Tool. Completing the tool enabled us to measure progress made in addressing modern slavery risks and to highlight the next steps for our businesses and supply chains. In particular, the output from the tool highlighted to us that there are three areas that we need to focus on to drive improvements. We shared the output of our report with our customers via the platform, and to our ethics committee members.

Due Diligence Processes

In order truly to achieve our ethics vision of '*enhancing lives through fish by protecting the human rights and ensuring decent working conditions for all those that work in or for our business*' we have to go beyond ticking the box and really get into the detail. The following case studies highlight key due diligence efforts undertaken in 2021:

CSR Strategy Process: Following on from the formation of our new CSR team, throughout 2021 we went through a very thorough CSR strategy process. The goal of the strategy was to ensure that we were prioritising our efforts and focusing on the most salient issues within our supply chain whilst at the same time understanding the solutions that will have most impact. The outcome of materiality assessments led to the presence of forced labour indicators scoring the highest for the social responsibility pillar. The results of the strategy process – from materiality to solution identification – was presented back to our customers, with a chance for them to offer their feedback and critique, and results were also presented back internally; ensuring that the business is continuously aware of the risk that modern slavery and forced labour presents to us as a business.

Supplier Tender Process: As part of our due diligence process throughout a tender process, we made the link that one of the companies tendering for our cold storage business was owned by a PLC company that had an agribusiness that was subject to an investigation following allegations of human rights abuses at their farms. Following on from calls that we had with the PLC CEO, and speaking to the potential supplier itself, we were satisfied that there was a negligible risk of modern slavery and thus were satisfied for the supplier to continue through the tender process.

Clandestine migrants in transport into the UK: Following on from shocking headlines showing migrant workers being transported into the UK in refrigeration lorries and noting that as a business we receive some seafood product from Europe this way, we joined a webinar in March which covered the evolving risks of clandestine migrants in transport into the UK; how businesses can manage these risks and integrate these processes into their approach to tackling slavery. Following on from the webinar, we took the opportunity to remind our relevant suppliers about the risks, as well as providing them with links to useful information sources, including the modern slavery hotline.

Alaska: Noting the importance that Alaskan salmon has to our business, and the fact that we must never assume that any supply chains are free from slavery or forced labour, our CEO spoke on a Seafood Source webinar entitled "social responsibility, Alaska's proactive, global-reaching approach"



in April. As a follow up to this, our CEO also contributed to an article that was published in the [National Fisherman](#) in July on the importance of social responsibility to customers of Alaska seafood as well as fishermen.

Yellowfin Tuna: As outlined in our 2021 modern slavery statement, we were encouraged to see the Republic of Korea Government's public commitment in December 2020 which outlined the changes that came into effect from January 2021 as part of their implementation plan to drive improvements for migrant workers across key areas such as recruitment and working hours. As such, throughout the year we continued to engage with our tuna suppliers, NGOs, and industry to get visibility of the new crew contracts; completed timesheets and crew surveys prior and after embarking vessels. We see transparency as the biggest enabler in ensuring that people are treated fairly, so we laud the efforts being made by our suppliers whilst recognising the need for continuous improvement.

In August we followed up with the MSC after reading concerning [articles](#) about a tuna longliner which had forced labour claims being made against it, to see their reaction since this vessel was part of a fishery that we source from. At the same time, we conducted a call with the supplier who supplies us with tuna from that fishery (from a different vessel) to get additional reassurances that they had no affiliation with the vessel in question or the vessel owners and we updated our customers on the due diligence that we had undertaken. The MSC let us know that the vessel in question had been removed from the fishery certificate whilst the vessel owners work on identifying the areas where changes are needed to get the Withhold Release Order removed.

Xinjiang, China: Following on from the compelling evidence of human rights violations in Xinjiang, and the subsequent announcement by the UK government in January to ensure that British organisations are not complicit in, nor profiting from the violations, we undertook some due diligence by asking our suppliers to declare to us if they supply us with any products from the Xinjiang region. As part of this due diligence, we found out that paprika used in a dye for smoking fish products that we source through an agent (i.e., indirectly) does come from Xinjiang. Upon making this discovery, we have been looking into alternative sources, whilst at the same time updating our customers who any product using paprika. As a result of this discovery, we have also strengthened our internal due diligence processes, particularly around the sourcing locations of our ingredients, which are often purchased through traders, meaning we may have less leverage with the primary supplier.

Training and Capacity Building

We understand that the duty to prevent modern slavery within our supply chain requires companywide participation. As such, the following activities are of note within the reporting period of this statement:

- All new starters attend a 2-day company induction at the start of their employment, which covers off Modern Slavery, the ETI base code and Stronger Together, including what actions to take if anyone suspects any cases within our sites. The induction also covers an overview of our policies and procedures, along with the terms and conditions of employment.
- We made and shared a three minute video to mark Human Rights Day in December where we particularly called out our ambition for every employee to live our purpose of enhancing lives through fish.



Tracking Progress:

The table below shows the progress that we have made against the commitments that we made within our 2021 modern slavery statement:

What we said we'd do	Status & future ambitions	R/A/G
We will review our policies to ensure they remain fit for purpose	Following the appointment of a new Group People Director, all NESI policies and procedures are being reviewed and updated so that they align across both of our sites.	
We will review the communications displayed around sites to continue to raise awareness of Modern Slavery and ensuring people know how to raise concerns either inside or outside of work	Site communication material is continuously reviewed and discussed as part of the SEF meetings.	
We will complete the Stronger Together "Progress Reporting Tool" and subsequently create an action plan with key focus areas to drive improvements	This was completed in March, and we have an action plan outlining our next steps. Our ambition is to improve our score by at least 10% in 2022, and we want to become a Stronger Together Business Partner in 2022.	
We will consider becoming a member of the Association of Labour Providers (ALP) to help promote responsible recruitment at our two sites	We became an ALP member in January. We will review this membership in 2022.	
We will map the non-conformances from our suppliers SMETA audits to classify the most common risks that exist across our different species and geographies, which will help us prioritise specific labour rights risks	This piece of work is underway, and because suppliers have regular audits, is a continuous work in progress.	
We will work with our suppliers to understand what modern slavery training they have done for their employees	We have started collecting data from suppliers on this, starting with our highest risk suppliers so this is not complete yet.	
We will work with our suppliers to map the use of recruitment fees and identify hotspots, and develop action plans	We have started collecting data from suppliers on this, starting with our highest risk suppliers so this is not complete yet.	
We will continue to work closely with our Korean tuna suppliers and the wider industry to verify the improvements outlined by the Korean Government	We spent a significant amount of time reviewing evidence sent to us by suppliers in 2021, as well as continuing to engage with the wider Korean industry.	
We will engage with recognised third-party vessel certification standards	We engaged with RFVS and FISH Standard for crew throughout 2021. Our ambition is to identify a vessel to go through the audit process in 2022.	

We also said that we would report back on the following KPIs in our 2022 Modern Slavery Statement, reflecting on our activities from 1 Jan 2021 – 31 Dec 2021.

KPI	2022 Result
Number of policies reviewed and updated	2 (Trading Charter and Ethical Policy)
Percentage of super temps that have completed Stronger Together training	N/A – we no longer use super temps and the responsibility now sits with the Area managers and People Team
Number of people from both sites who have completed Responsible Recruitment Training	1 member of Chessington's people team completed the training



Number of FNET working groups actively engaged in	4
Number of full GLAA audits conducted and number of non-conformances raised	4 audits conducted across both sites and 2 labour providers. No N/C's raised.
Percentage of whistle-blower cases related to modern slavery issues raised through Navex Global and percentage of those closed out	0 whistle blower cases raised in 2021

In the next 12 months (Jan – Dec 2022) we will continue to report back on the above KPIs. Adding the following KPIs will ensure that our modern slavery strategy is responding to changing risk:

- % improvement made in the Stronger Together Progress Reporting Tool
- % score achieved in the Employer Good Practice Implementation Checklist
- % of suppliers that have completed detailed SAQs through our supplier compliance management system
- No of suppliers trained on key ethical topics

Whilst we are proud of the many steps we have taken in 2021, we recognise that much difficult work lies ahead, especially as the Covid pandemic and it's knock-on effect continues to be felt globally. NESI will continue to raise awareness of the existence of forced labour and modern slavery in global supply chains and further strengthen our identification and due diligence processes. We will continue to invest resources to work with industry players, NGO's, and Governments around the world to effect positive change where it is needed and to ensure that we truly do enhance lives through fish.

Signed by Dan Aherne, NESI Group CEO

27.06.2022