



Modern slavery Policy

Introduction

This statement sets out Iceland Seafood Barraclough Ltd.'s actions to understand all potential modern slavery risks and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking within its own business and its supply chains. This statement relates to actions and activities during the financial year 1st Jan 2018 to 31st Dec 2018.

As part of the seafood industry the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation is absolutely committed to preventing slavery and human trafficking in its corporate activities and takes reasonable steps that its supply chains are free from slavery and human trafficking.

Organisational structure and supply chains

This statement covers the activities of Iceland Seafood Barraclough Ltd

The main core of the business is the cutting & packing of frozen fish, value added fish products, smoking of fish & seafood species into retail, and food service sectors of the food industry.

The company is BRC, MSC & ASC certified as well as registered member of Sedex & audited against the Sedex Members ethical trading audit (SMETA).

Countries of operation and supply

The organisation currently operates a production & packing facility in the United Kingdom, with a world-wide supply base that includes: - China, Chile, Peru, USA, Iceland, Norway, Russia, India, Indonesia, Turkey, Vietnam,

The following is the process by which the company assesses whether or not particular activities or countries are high risk in relation to slavery or human trafficking:

- We have reviewed our supply base using the Trafficking in persons report July 2015 to access each countries tier ranking and used this in line with our approved supplier risk assessment along with physical audits of the individual supplier to determine suitability.

A Guide to the tiers

Tier 1 – The government of countries that fully comply with the TVPA (The trafficking victims protection act) minimum standards for the elimination of trafficking.

Tier 2 – The governments of countries that do not fully comply with the TVPA's minimum standards but are making significant efforts to bring themselves into compliance with those standards.

Tier 2 Watch list – The government of countries that do not fully comply with the TVPA’s minimum standards, but are making significant efforts to bring themselves into compliance with those standards, and for which:

- A) The absolute number of victims of severe forms of trafficking is very significant or is significantly increasing**
- B) There is a failure to provide evidence of increasing efforts to combat severe forms of trafficking in persons from the previous year, including increased investigations, prosecutions, and convictions of trafficking crimes, increased assistance to victims, and decreasing evidence of complicity in severe forms of government officials**
or
- C) The determination that the country is making significant efforts to bring itself into compliance with minimum standards was based on commitments by the country to take additional steps over the next year.**

Tier 3 – the governments of countries that do not fully comply with the TVPA’s minimum standards and are not making significant efforts to do so

High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Fishing vessels & sites without Sedex registration or Ethical trading audits

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows

- **Policies:** The Head of Responsible Sourcing is responsible for putting in place and reviewing policies and the process by which they are maintained. All policies and procedures are regularly reviewed. All ongoing supplies & services are risk assessed to determine the level of control that is felt necessary to ensure our organisations anti – slavery initiatives are followed
- **Risk assessments:** The company human rights & modern slavery risk analysis is based on the annual trafficking in persons report published by the Department of State – USA, which focuses on strategies to prevent human trafficking around the globe. The report analyses governments prosecution, protection, and prevention efforts & how governments can identify people most at risk & reduce their vulnerability. Each of our suppliers are risk assessed using this report as well as our knowledge of each business & auditing of relevant sites. Our expectation is that all our suppliers will be registered with Sedex & have undertaken a full ETI audit by December 2020.
- **Investigations/due diligence:** The Head of Responsible Sourcing will review all instances of slavery & human trafficking. All audits carried out at sites will include an Ethical trading section and will reference slavery and human trafficking; this came into force in August 2016. Any issues highlighted with agencies at the site in the UK, will be dealt with at a senior management level & the Gangmasters & Labour Abuse Authority (GLAA).

Training: All staff have had a copy of our ethical trading policy which is based on the ethical trading initiative and signed & dated to state they understand the content.

The Head of Responsible Sourcing has been trained as a Sedex/SMETA auditor and passes on his knowledge of the requirements to other senior managers within the business. Our aim is that our entire supply base will be audited to the Sedex requirements by end of 2020. The site undertakes a weekly senior management meeting as well as a monthly KPI review and any areas of concern are raised during these meetings and action plans put in place. It is important that our suppliers understand and respond to the identified slavery and human trafficking risks, any information identified will be passed on to them and reviewed during audit visits.

Relevant policies

The organisation operates the following policies that describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations

Whistleblowing policy the organisation encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. The company whistleblowing procedure is found in the employee handbook.

- **Employee code of conduct** the organisation's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating abroad and managing its supply chain.
- **Supplier/Procurement code of conduct** the organisation is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. All suppliers based in tier 2 and below countries must have completed the Sedex on line self-assessment and as from December 2017 must have undertaken a full Sedex audit. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- The organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is using before accepting workers from that agency.

Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- mapping the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of each new supplier
- reviewing on a regular basis all aspects of the supply chain based on the supply chain mapping;

- conducting supplier audits or assessments through the organisation's own auditor, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- creating an annual risk profile for each supplier;
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through our technical dept and requiring them to implement action plans as necessary.
- participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular Sedex registered or "Ethical trading" initiatives;
- using the Sedex details or ethical supplier audit information, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs) in light of the introduction of the Modern Slavery Act 2015. As a result, the organisation has

- developed a system for supply chain verification which has been in place since January 2015 whereby the organisation evaluates potential suppliers before they enter the supply chain; and
- Reviewed its existing supply chains as a minimum annually or when any issues have arisen.

Training

The organisation requires all staff working in countries designated below tier 1 in the "trafficking in persons report" to have a clear understanding of modern day slavery & ethical trading.

The organisation's modern slavery training covers

our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below a country's national minimum wage, or the provision of products by an unrealistic deadline;

- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available;
- how to identify the signs of slavery and human trafficking;
- what initial steps should be taken if slavery or human trafficking is suspected;
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation;

- what external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority and "Stronger together" initiative;
- what messages, business incentives or guidance can be given to suppliers and other business partners and contractors to implement anti-slavery policies; and what steps the organisation should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Awareness-raising programme

As well as training staff, the organisation has raised awareness of modern slavery issues by circulating information to staff on the notice board which is available in dual languages and reviewing issues during the monthly KPI review.

The information & KPI report explain to staff the relevant issues:

- the basic principles of the Modern Slavery Act 2015;
- how employers can identify and prevent slavery and human trafficking;
- what employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the organisation;
- What external help is available, for example through the Modern Slavery Helpline.

This statement has been approved by the organisation's board of directors, who will review and update the statement annually.

Director signature:

A handwritten signature in black ink, appearing to read 'Peter Hawkins'.

Director name:

PETER HAWKINS

Date:

25.3.19.

