



## NEW ENGLAND SEAFOOD INTERNATIONAL LIMITED

# Modern Slavery Statement 2018

*This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by New England Seafood International Limited to prevent modern slavery and human trafficking in its business and supply chains.*

### **Introduction**

The New England Group (“NESI”) welcomes the Modern Slavery Act 2015 and the legal framework it provides to prevent slavery, servitude, forced labour and human trafficking (“Modern Slavery”) in the UK and around the globe. We are strongly committed to leading the eradication of Modern Slavery and welcome the addition of the ‘Transparency in Supply Chain’ clause.

NESI does not tolerate Modern Slavery in our organisation or in our supply chains. This statement sets out the steps that we have taken to investigate the possibility of Modern Slavery occurring in our organisation or our supply chains and addresses the actions we will be taking to move towards our goal of eliminating Modern Slavery.

### **Our business and supply chains**

NESI is the UK’s leading supplier of premium wild and farmed fish & seafood into the UK market, with species such as sea bass, sea bream, yellowfin tuna, albacore tuna, keta and sockeye salmon along with other raw materials from the UK and abroad. This process is managed through a complex and diverse global supply chain. Our vision is to ‘*show people how to enjoy fish every day*’.

### Group History

NESI is privately owned. The NESI Group comprises of three trading companies New England Seafood International Limited, Joiij Sushi Limited (“Joiij”) and Albert Darnell Limited (“ADL”). The Group turnover for the year to October 2017 was £151m.

The business was founded in 1991 and in 1993 began importing fresh tuna. We supplied our first retail customer in 1995. In 2016, NESI acquired ADL, located in Grimsby who supply cod and haddock to the food service and retail sectors. Both businesses operate separately but under one Managing Director who reports to the NESI Group CEO. Joiij was incorporated in December 2012 as a 50:50 joint venture between NESI and Comptoires Des 3 Caps Sarl (registered in France) with the objective of meeting the supply requirements of the sushi chains in the UK and Europe. Joiij has its own Managing Director who also reports into the NESI Group CEO.

The companies within the NESI Group source fish and seafood from over 30 countries in the world as well as having further supply chains in packaging and added value raw materials. Our factories in Chessington and Grimsby employ over 500 people from more than 35 different countries. We have a diverse and multi-cultural workforce who are passionate about our customers and our products.

### Our values

We recognise that our business operations have an impact on the environment and the people and communities with whom we work. As well as the moral obligation to ensure that we do the right thing



## NEW ENGLAND SEAFOOD INTERNATIONAL LIMITED

by all of our stakeholders, we understand that commercial success and future business depends on our ability to operate responsibly as an organisation.

Our core company values are:

- Respect for the environment, natural resources and people;
- Customer care;
- By Learning, We Grow;
- Team spirit;
- Integrity.

As a private label supplier to the leading UK supermarkets, we have a commercial imperative to ensure that we comply with our customers' CSR policies. We are regularly audited against these policies as they form part of 'conditions of supply'. Our core values and our customers' policies have a direct impact on our supply chains and dictate the way we trade.

The scope of this statement includes all fish and seafood, packaging and ingredients, under the NESI Group. We are committed to understanding our supply chains from '*feed or field to fork*'.

### **Policies, Due Diligence & Training related to Modern Slavery**

NESI operates under our 'Trading Charter', which details how we trade in both a responsible and ethical manner.

#### Tackling Modern Slavery in our business

We have Ethical Trading Policies that we are rolling out across our group. These policies are based on compliance with the Base Code of the Ethical Trading Initiative ("ETI"). The ETI Base Code is founded on the conventions of the International Labour Organisation ("ILO") and is an internationally recognised code of labour practice.

In addition, all our employees are checked to ensure they are legally entitled to work in the UK. This process certifies that all documentation remains valid and has not lapsed.

We employ temporary labour to maintain our 24/7 operation. We ensure that the temporary labour providers we use are licensed by the Gangmasters and Labour and Abuse Authority (<http://www.gla.gov.uk>) and we use Active Check to verify this.

New England Seafood International Ltd is a member of the Supplier Ethical Data Exchange ("SEDEX") as an A/B member. We have a bi-annual SEDEX Member Ethical Trade Audit ("SMETA") as part of our due diligence and continuous improvement processes.

We have a dedicated whistleblowing process called 'Speak Up!', which is aimed principally at our employees. This encourages the reporting of any wrongdoing, which extends to human rights violations relating to Modern Slavery. It is confidential, anonymous and multilingual. All reports are fully investigated and appropriate remedial actions taken by our internal HR team.

We also have a Staff Employee Forum ("SEF") where elected representatives from all parts of the business discuss working relationships and the working environment to encourage support and communication.



# NEW ENGLAND SEAFOOD INTERNATIONAL LIMITED

## Tackling Modern Slavery in our supply chains

We believe firmly in fair, open and honest trading and always seek to develop long-term partnerships with our suppliers. We build strong partnerships with suppliers who share and are prepared to commit to our values, which are consistent with the ETI Base Code.

We require our suppliers to demonstrate, through audits of their processing facilities, fair and ethical treatment of their employees and other stakeholders and compliance with national regulations.

We encourage our suppliers to join SEDEX as a key method of mitigating risk. If any suppliers who have joined Sedex are categorised as 'high risk' from the SEDEX Risk Assessment Tool, we will require them to procure an independent third party SMETA audit. The Risk Assessment Tool (as defined by SEDEX) takes into account the risk from the suppliers' Self-Assessment Questionnaire ("SAQ") and the Inherent Risk by country as determined by the Verisk Maplecroft Labour Rights and Protection Index.

## Internal Training & Resources

All our colleagues have training in the form of an induction when they start working for us. This induction covers the ETI Base Code, our Speak Up! Whistleblowing policy, Stronger Together, Migrant Help and SEF. This makes it clear where our colleagues can obtain help and support if required.

We also use the resources available from Stronger Together <http://stronger2gether.org> to support our training and enhance our understanding of Modern Slavery in supply chains.

We work with Migrant Help UK <http://www.migranthehelpuk.org> who are a leading national charity offering support, guidance and accommodation to vulnerable migrants across the UK.

## Due Diligence: Wild fish and Farmed fish supply chains

We have a due diligence process in place that we are focused on strengthening, however, we recognise that we cannot have full oversight into everything that is happening in our supply chain. As such, we recognise the importance of collaborations to improve our understanding of issues and leverage to tackle them and we have detailed these below.

Our team of experienced seafood experts have a global knowledge of the fish and seafood industry with a good working understanding and the skills to determine ethical risk within our supply chain. This knowledge is informed by our experts' participation in forums such as the UK-wide Seafish Industry Authority's Ethical Common Language Group and the working group on the ethical integrity of Alaskan salmon production. We actively promote close interaction with wider supply chains through membership of groups such as the UK Seafood Industry Alliance and working with industry, NGO and retail stakeholders with experience of supply chains in which issues have been identified and are in the process of further investigation and review to bring about change, such as Project ISSARA in Thailand.

We realise that due to the global nature of our supply chains we need to consider all fish & seafood, packaging and ingredients. There are several factors that could lead to a higher risk of human rights abuses including Modern Slavery, such as, our fish and seafood supply chains are often complex, involve multiple nationalities across the flag state, ownership of vessels and ports of landing or transshipping, the catch can be high value fish such as tuna, and some tuna fishing vessels can be at sea for



## NEW ENGLAND SEAFOOD INTERNATIONAL LIMITED

very long periods of time. We recognise that our supply chains could potentially pose a higher risk than other simpler or lower value supply chains.

New England Seafood International Ltd was one of the first UK fish processors to implement a record of fishing vessels supplying us including their crew profiles. The company requires all suppliers to demonstrate their vessels' legality and licence to operate in the relevant areas. The company's vessel register includes a profile of the crew make-up such as numbers, their nationalities and whether they are employed through agencies and through our questions ascertains whether they are employed in accordance with the ETI Base Code. In addition to the vessel registers and in conjunction with the Food and Drink Federation and Icelandic Seachill we have developed a crew agreement document. We are in the process of distributing this document to our supply base on a risk assessed basis. This document explains our stance on the fair treatment of crew and requires our suppliers to agree and act only in accordance with those terms. The crew agreement varies by nation in accordance with their employment laws but the core ETI Base Code requirements do not materially change.

As identified above, one of our main methods of mitigating risk is to utilise SEDEX and SMETA. However, as this only applies at factory level and not vessel or farm and we recognise there are limitations of audits in identifying issues in this industry, we have developed a four-level risk assessment process for ensuring crew welfare aboard vessels that operate in the high seas. We are currently trialling this process with our wild fish suppliers that we have identified as high risk.

This risk assessment includes 4 levels, which are progressive (i.e. if suppliers are deemed to be high risk based on the information provided in Level 1 then the assessment progresses to Level 2 and so on):

- Level 1 – Annual Crew Questionnaires - 21 questions related to workers
- Level 2 – Crew Risk Assessment – 50 welfare indicators
- Level 3 – Crew Welfare Profile – for use in fisheries identified as higher risk
- Level 4 – FDF frozen at sea crew welfare agreement – for fisheries considered high risk

Our risk assessment process is based on:

- Seafish Responsible Fisheries Scheme (RFS) <http://www.seafish.org/rfs>
- US Department of State Trafficking Victims Prevention Act (TVPA) <https://www.state.gov/j/tip/laws>
- Business Social Compliance Initiative (BSCI) Countries Risk Classification <http://www.bsci-intl.org>
- Verisk Maplecroft Labour & Human Rights Index <https://maplecroft.com/human-rights-due-diligence-business-risk>
- International Labour Organisation (ILO) <http://www.ilo.org>
- Food & Drink Federation guidance on labour conditions on board Frozen at Sea Tuna Vessels which draws on the ILO 188 Work in Fishing Convention, 2007 (No. 188) and the ETI Base Code <https://www.fdf.org.uk>

In terms of farmed fish, our suppliers need to be third-party certified to BAP, Global GAP or ASC which, although not specifically focused on Modern Slavery, include elements related to ethical trading.

Separately, all New England Seafood International Ltd's fish and seafood suppliers are visited and audited by us using a supply-base risk assessment. Our experienced and trained team consists of



## NEW ENGLAND SEAFOOD INTERNATIONAL LIMITED

colleagues in technical, species and sustainability functions who are on site regularly at farms and processing factories. The team is increasingly gaining visibility of fishing vessels that supply us, through our vessel registers and crew agreements and through visits to vessels in port.

We are highly aware that the global fishing industry and other stakeholders do not, yet, have the full answer on how to audit workers at sea. For example, the ILO's Convention 188 has not yet been ratified by all countries, and there is an absence of international monitoring and surveillance on this matter and no finalised solutions to implement physical checks on board all vessels at sea.

There are and will be a variety of ways in which to make transparency at sea '*business as usual*' globally. This includes CCTV, satellite technology and observers at sea. However, willingness to engage aside, international and national laws do not yet require 100% transparency at sea for all vessels.

Many supply chains are not yet aware of the concept of Modern Slavery and do not have regional or national monitoring of this issue or the legal instruments to do so. Whilst we are fully cognisant of the possibility of, and in agreement with the need to ensure we eliminate risks of, Modern Slavery in our supply chains we also recognise that this is an issue that requires not only our engagement but it has to involve industry-wide and international stakeholders' engagement on these issues.

### **Further steps to prevent Modern Slavery**

In 2018, it is our intention to carry out the actions referred to below.

We will continue to work with external experts to undertake a detailed risk analysis of our sourcing and product areas so we build a clear idea of where the biggest risks lie and where our actions can have a positive impact. This will aim to map the fish and seafood supply chains across the NESI Group beginning with New England Seafood International Ltd. This process will engage with our customers and suppliers to give us a picture of our ethical status.

We will use the outputs from the work carried out by our external experts to drive our Ethical Trade strategy at a senior level and determine the resource and actions we need to take make improvements.

We will ensure alignment across the Group to the Ethical Trading Policy

We will ensure that our Whistleblowing Policy is in place for the total NESI Group

We will aim for more suppliers to be registered on SEDEX and linked to NESI with full visibility of SAQ's and any ethical audits.

We intend for Joiij to be registered on SEDEX as an A/B Member.

We intend to roll out further the vessel-level risk assessment process across more of the NESI supply chain.

We intend to continue engagement with e.g. with the Marine Stewardship Council, Responsible Fishing Scheme ("RFS"\*) and SEDEX to further develop tools for the establishment of ethical data for fish and seafood.



## NEW ENGLAND SEAFOOD INTERNATIONAL LIMITED

\*The RFS International tool is in development by Seafish and being piloted overseas currently. RFS when launched will be a tool with which to gain some transparency of crew conditions on board vessels – with the auditing carried out in port. RFS does not, yet, promise to be the answer for auditing vessels out at sea – nor is there yet a fully-launched and funded programme of outreach to persuade international governments and suppliers to utilise the UK-founded RFS model (noting that the UK fleet itself is short of being 100% RFS certified). It is our hope that the RFS scheme will include the outreach necessary to engage other national governments and suppliers to enter into RFS certification processes. NESI will try to engage our suppliers and customers in RFS. We note that this is not going to be an instant solution and may take several years to promote the RFS concept and achieve engagement and compliance across all international supply chains.

As summarised above, we have been leading the way on ethical trading within our fish and seafood supply chains, however, we recognise that ethical issues are not static and that requires us to seek continual improvement - across not only fish, but also packaging and non-fish ingredients, whilst we continue to drive our core fish and seafood business forward.

A handwritten signature in black ink, appearing to read "Dan Aherne".

Signed by Dan Aherne NESI Group CEO