



NEW ENGLAND SEAFOOD INTERNATIONAL LIMITED

Modern Slavery Statement 2020

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 for our financial year Nov 2018-October 2019.

Introduction

The New England Seafood 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 are taking to move towards our goal of preventing and eliminating Modern Slavery.

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*’.

Our business and supply chains

NESI is the UK’s leading supplier of premium wild and farmed fish & seafood into the UK market. We supply species such as sea bass, sea bream, yellowfin tuna, albacore tuna, keta and sockeye salmon to UK and European markets 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

The business was founded in 1991 and in 1993 began importing fresh tuna. We supplied our first retail customer in 1995. 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 approximately 750 people from more than 35 different countries. We have a diverse and multi-cultural workforce who are passionate about our customers and our products. NESI is privately owned and the Group turnover for the year to October 2019 was £160m.

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 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:



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

In September 2018 Investor Board led the establishment of a cross functional Ethics Committee. One of the primary roles of this Ethics Committee is modern slavery governance including to identify, prioritise and address modern slavery risks within our business and our supply chains. During this reporting period, the Committee was populated by the following senior managers in our business:

- Dan Aherne- Group CEO and co-chair
- Melissa Pritchard- Co-Chair and Head of Ethics
- Adam Peasey- Species Managing Director
- Cassie Leisk- Head of Sustainability
- Ian Mayo- Site Director NESI Chessington
- Amelia Reid- People Director
- Vivian Bielak – UK national account manager
- David Jeffries - Group Technical Director
- Lucy Blow- External Sustainability and ethics consultant

The committee's strategy over the last year has been as follows:

- *The risk assessment of slavery anywhere in NESI and its supply chains with the clear goal of avoidance of those risks through focused action and diligence.*
- *Own the human rights agenda cross-functionally*
- *Demonstrate leadership internally and externally*
- *Prioritise activities which seek to prevent & mitigate the most severe impacts or where delayed response would make them irremediable*
- *Be the honest broker between demands and expectation of industry and NGOs and practical and sustainable change.*
- *Grow eXperts in the field of human ethics in seafood*
- *Embrace the challenge and support required changes*
- *Influence the industry to operate with openness and integrity*
- *Collaborate to develop solutions and increase our positive contribution.*

ETHICS COMMITTEE

Vision: *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.*

Mission: *Ensure everyone in our business and supply chains is safe, respected, and treated with equality and dignity at work.*

Goal: *Identify human rights issues and drive improvements from fish to plate.*



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Our approach to supply chains:

Both NESI and its carefully selected suppliers are responsible for ensuring decent working conditions and protecting human rights. Our ethics approach is based on the following values:

- Honesty
- Integrity
- Trustworthiness
- Loyalty
- Fairness
- Respect for others
- Commitment to excellence
- Dignity
- Diversity

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, fair and ethical treatment of their employees and other stakeholders and compliance with national regulations.

Tackling the risks of Modern Slavery in our business

The following outlines our existing efforts to prevent the possibility of Modern Slavery occurring in our organisation or our supply chains and our progress during our financial year 1st November 2018-31st October 2019:

Policies: our business

We continued to implement these existing policies:

Developed **3** new policies

- We already have a dedicated whistleblowing policy and process called 'Speak Up!', for 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 leadership team.
- NESI has been delivering our ethics responsibilities under our 'Trading Charter', which details how we trade in both a responsible and ethical manner and applies to our whole group. This includes a description of our ethical trade policy and is based on compliance with the Base Code of the Ethical Trading Initiative ("ETI") against which we are audited. This charter is still in use, but will imminently be updated and further, will point to our new ethics policies (see below).
- We pay above the living wage: we value our employees and recognise that national minimum wage can fall short of what is needed to meet living costs and support a family.

During this financial year we made the following progress on policies:

- We have revised our Ethical Trading Policy ensuring there is clear reference to modern slavery; including an outline of our strategy to prevent, identify and remediate. It is based on compliance with the Base Code of the Ethical Trading Initiative ("ETI") against which we are audited. The ETI Base Code is founded on the conventions of the International Labour Organisation ("ILO") and is an internationally recognised code of labour practice. The policy is



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public facing and we require all employees to adhere to it and all suppliers to develop their own public ethical trading policies along similar lines.

- Supplementary to our Ethical Trading Policy, we developed the Ethics Committee Vision, Mission, goals and strategy, which has a significant focus on preventing modern slavery across our business and supplying partners.
- Our Ethics Committee identified the key human rights risks as modern slavery and death or serious injury. We recognised we have more work to do to fully analyse our responsibility and leverage, prioritise where we can have the most impact and set SMART targets relating to both these human rights risks.
- We recognise that to fully analyse our supply chains including at sea, requires collaborative work within our industry since the UK and other geographies have significantly different approaches or levels of transparency in supply chains, particularly at sea. To this end, NESI continues as a member of the SEA Alliance steering group and attends key forums that engage in ethics in the seafood industry, such as the ethics Common Language Group.
- We have reviewed our handbook of policies which is available to all employees, including updates to our whistleblowing policy and clear details of our confidential, independent whistleblowing hotline.
- We have also revised our induction process to include details of the ETI Base Code, Stronger Together and tackling Modern Day slavery and existing staff from all functions have received Stronger Together training.

[Policies: our supply chains](#)

We continued to implement these existing policies:

- Our aquaculture suppliers must adhere to our aquaculture code of practice which includes minimum ethical requirements based on the ETI base code.
- As part of our approval process, supplying fishing vessels that freeze at sea must sign (by a senior member) the Food and Drink Federation crew agreement which NESI helped develop: this policy describes our stance on the fair treatment of crew and is based on the ETI base code and International Labour Organisation Convention 188 (“ILO 188”)- working in fishing convention.
- We require third party certification of our raw material seafood suppliers to specific environmental standards that incorporate social assurance: Marine Stewardship Council (MSC) or responsible fisheries management (RFM) and Responsible Fishing Scheme (RFS) for wild fish (or to be in a credible improvement project towards that); Best Aquaculture Practices (BAP), Global GAP (GG) or Aquaculture Stewardship Council (ASC) for our farmed seafood supply chains.
- We require all UK suppliers with a turnover of >£36million to provide us with copies of their Modern Slavery Statement during each audit, as part of our Quality Management System.

During this financial year we finalised an Ethics policy which was approved by our Investor Board in January 2020. Beyond that, NESI made the following progress on policies:

- Communicated to our suppliers our ethics policy which details our requirements and expectations as a condition of continued supply and calls out the priority of preventing and tackling modern slavery.



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- Presented at forums in both Alaska and Korea on issues of worker welfare and the importance of transparency in social assurance.
- As of January 2020, suppliers supplying 97% of NESI's farmed salmon, bass and bream volume have received NESI's Aquaculture Code of Practice and are working towards the health, safety, ethics and welfare requirements set out. The remaining 3% of supply will receive the requirements by the end of 2020.

Due diligence and risk assessments: our business

We continued to implement this existing due diligence:

- In recruitment we conduct robust due diligence on all new employees: including eligibility to work in the UK to help safeguard against forced labour and human trafficking. Checks are carried out on rights to work and ECS (Employer Checking System) checks are conducted on any active VISA applications via the Home Office system.
- We employ temporary labour to maintain our 24/7 operation in Chessington and our 7-day a week operation in Grimsby. To protect these individuals and identify potential modern slavery or human trafficking we ensure that the temporary labour providers we use are licensed by the Gangmasters Labour and Abuse Authority (GLAA) (<http://www.gla.gov.uk>) and we use Active Check to verify this. We audit the agencies that supply us with agency staff every six months under the GLAA. We also conduct our own checks and interviews with agency staff regularly, with an established procedure to follow up any concerns or inconsistencies.
- All employees are paid into their own bank accounts. We do not allow for anyone to be paid into any other bank account in any other name.
- We have a Staff Engagement Forum ("SEF") in Chessington site and Workers Consultative Group in our Grimsby site, 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 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") at all our sites as part of our due diligence and continuous improvement processes.

During this financial year we made the following progress on due diligence:

- Had a full, periodic, semi-announced third-party ethical audit (SMETA) of our Grimsby Site: this included group and individual interviews of 26 workers conducted in privacy and confidence, and a partial re-audit to verify some elements of our corrective action plan.
- Revised our labour provider auditing standard/process: we carry out regular 6 monthly ETI audits on all agencies that provide us with additional labour. Audits are completed against GLAA standards. Failure to meet these standards in an audit will result in immediate remedial actions being put in place by the People team to ensure that tighter monitoring of compliance is met. Follow up actions and re-audit will also be discussed and agreed in writing between both parties.
- As a direct result of uncovering poor practice in one of our agency labour providers during a routine audit (and follow up) we ceased doing business with that supplier.

3 third party ethical audits of our sites



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Due diligence and risk assessments: our supply chains

We continued to implement this existing due diligence:

- All our supply chains continue to be mapped onto “Authenticate” software platform where a full chain of custody displays vital compliance information about the direct and indirect suppliers involved in the supply of products into NESI. This data can be used to monitor compliance, reduce risk and highlight previously unseen areas of our trading network, right back to source.
- As a minimum, our suppliers are risk assessed using NESI’s own supplier risk assessment process, which looks at various indicators and tools to identify various company and country risks and the steps required to manage those risks. Suppliers are required to complete ethical related questions in our Self-Assessment Questionnaire (“SAQ”). This information combined with other external data points such as the Food Network for Ethical Trade (“FNET”) rating, determine whether a SMETA audit is required and determines the need and schedule required for further auditing.
- As determined by NESI’s supply-base risk assessment and schedule, most of NESI’s seafood suppliers are audited by our in-house audit experts whose audit questionnaire contains several elements relating to modern slavery based on the ETI base code. Our experienced team consists of colleagues in technical, species and sustainability functions who are on site regularly at farms and processing factories.
- We also require our suppliers to join SEDEX as a key risk assessment process where they are required to complete a Self-Assessment Questionnaire (“SAQ”) which has a high focus on modern slavery risks. The Risk Assessment Tool (as defined by SEDEX) considers the risk from the suppliers’ SAQ and the Inherent Risk by country as determined by the Verisk Maplecroft Labour Rights and Protection Index. It provides an output risk-rating for NESI to use in our modern slavery risk evaluations and assess where a third-party ethical audit is required. Suppliers are required to link to NESI for visibility and in many cases are also required to link to our customers, so that they too have full transparency of ethical risks and audit results. We have improved our registration coverage of suppliers on SEDEX.
- Following on from the SEDEX risk assessment above, supply base scores are evaluated and prioritised -our goal is that any suppliers categorised as ‘high risk’ from the SEDEX Risk Assessment Tool, are required to procure an independent third-party ethical audit, preferably a SMETA audit (or equivalent where agreed). We have set thresholds on acceptable audit results and suppliers which exceed these risk being managed out of the supply base. Currently it is not possible to SMETA audit Frozen at Sea vessels so there is an ethical audit derogation for these, however they must still complete the NESI SAQ or comply to NESI’s SEDEX requirements listed above.
- Within the fishing industry, we recognise there is an inherent link between modern slavery risk and the risk of illegal, unreported and unregulated fishing. Therefore, we apply a high-level of due-diligence to ensure that all wild fish suppliers demonstrate their vessels’ legality and licence to operate in the relevant areas: NESI was one of the first UK fish processors to implement a record of fishing vessels supplying us, and we verify this information through our



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own IUU checks and spot traceability exercises that extend to the supplying vessel and legal “catch certificate” or equivalent.

- For several years we have been capturing specific information to profile crews at fleet or vessel level where feasible. We also require detail relating to modern slavery risks and the conditions for crew working on vessels that supply NESI prior to approving supply, wherever possible. There are instances where it is not possible to collect such information prior to approval, for example where fish is bought via auction.
- Few countries have ratified the ILO 188, so we continue to encourage government ratification in countries we supply from- through our networks and where we have influence to advocate. However, we feel social standards at sea should not be hindered by political sign up to ILO 188 and so require wild fish suppliers to work towards achieving Responsible Fishing Scheme (RFS) certification -(a voluntary standard, based on ILO 188 and in revision) once the revised version is launched and fit for global application, or to achieve an equivalent certification. This will help increase transparency and mitigate against modern slavery at sea even if their country has not yet ratified ILO 188
- In instances of high-risk countries and where feasible, our aquaculture suppliers are audited (second or third party) against our ethics and welfare policy as part of a wider audit covering sustainability, health and safety.
- Supplier issues raised are highlighted to the appropriate function in our business and dealt with appropriately.

During this financial year we made the following progress on due diligence

- Implemented a data system that can capture ethics data. 70% of suppliers have registered on the platform.
- Have created 40 supply chain maps of fish and seafood suppliers.
- Increased the frequency of our internal traceability exercises by 20% as a tool to verify supply chain integrity.
- 70% of suppliers now registered on Sedex.
- Extended our vessel level crew data questionnaire across more of our supply chains.
- We took further steps to engage our supply chains on modern slavery risk mitigation. These included engagement with our wild salmon supply chain where we presented on worker welfare and social assurance to the Alaskan Seafood Marketing Institute (ASMI) customer Advisory Panel . We presented at a series of forums in South Korea as well as engaging the owners and leaders of our major suppliers on this agenda.
- Following our previous support in developing the Publicly Available Specification on traceability “Exercising due diligence in establishing the legal origin of seafood products and marine ingredients. Importing and processing. Code of practice” (PAS 1550 17) which includes requirements relating to human rights due diligence and modern slavery prevention in a collaborative cross-industry group, we through the SEA Alliance are contributing to the development of PAS Guidance in order that it can be an effective and practical document. NESI expects the PAS to be amongst the optimal frameworks for our advocacy, and where appropriate as a guiding principle for our risk management and due diligence.

20% increase in
traceability due diligence

70% of our suppliers are
registered on Sedex



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Internal Training & capacity building

We continued to implement this existing training and capacity building about modern slavery and trafficking:

- All staff have training in the form of an induction when they start working for us. This covers the ETI Base Code, our Speak Up! Whistleblowing policy, Stronger Together, Migrant Help and our Staff Engagement Forum (SEF). This makes it clear where our colleagues can obtain help and support if required.
- We use the resources available from Stronger Together <http://stronger2gether.org> to support our training and enhance our understanding of Modern Slavery in supply chains. All representatives of our Staff Engagement Forum have participated in Stronger Together training on Modern Slavery to equip them to identify any cases of modern slavery and trafficking and trigger remediation.
- We work with Migrant Help UK <http://www.migranhelpuk.org> who are a leading national charity offering support, guidance and accommodation to vulnerable migrants across the UK.

During this financial year we made the following progress on training and capacity building about modern slavery and trafficking:

- We recognise that one of the most important steps to preventing, tackling and remediating modern slavery and human trafficking is education on the signs to look out for and knowledge of how to deal with issues if they arise- both in our business and our supply chains. So we identified the most crucial teams that require this capacity building and provided external training by Stronger Together to 26 staff from our Operating Board, Workers Consultative Group in our Grimsby site, Staff Engagement Forum at our Chessington site, Ethics Committee.
- We recognised the training needs of different staff vary so we also provided bespoke Stronger Together training of 11 staff comprising our buyers, species experts, species directors, sustainability team and other colleagues who might encounter victims directly within our supply chains. This workshop covered the same indicators and guidance on modern slavery as the workshop for the other employees, but it also included tackling modern slavery through purchasing practices, and tackling modern slavery in global supply chains - since these staff are responsible for our purchasing and/or are regularly visiting our supply chains, including suppliers at the raw material level.
- We provided briefings to all our factory and office staff in our Chessington site, through three separate sessions, on the Ethical Trade Initiative base code, and a reminder of what to do if you suspect Modern Slavery – including details of the Modern Slavery Hotline number.
- We provided two Stronger Together workshops on SEDEX and SMETA for 23 staff covering both our senior management and those in senior Operations and procurement roles, to better equip our teams with the knowledge of using the SEDEX platform for inputting ethical data, and monitoring our supplier's ethical data, as well as understanding more about third party ethical audit scheme that we use and require of our suppliers.

5 External training sessions relating to modern slavery covering 57 staff

3 internal training sessions covering all staff at our Chessington site



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Collaboration

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 business and supply chains, we also recognise that this is an issue that no single business can resolve alone. It requires not only our engagement but must involve industry-wide and international stakeholders' engagement on these issues to have the most leverage. Therefore, we have spent significant time collaborating in several forums which aim to tackle modern slavery including:

- The *UK Seafood Industry Alliance*- providing a compelling voice at national, EU and international level to meet the full range of challenges in providing consumers with secure, affordable, nutritious and sustainable fishery products at a time of unprecedented uncertainty and change;
- The *Ethics Common Language Group*- designed to establish a common understanding of ethical issues impacting on the seafood supply chain, to communicate the work currently going on to address them and agree a clear agenda for future action.
- The *Seafood Ethics Action ("SEA") Alliance*- is a platform to share information on emerging issues, agree best practice solutions, and provide a forum for collective pre-competitive action where it is not better fulfilled by an existing organisation. NESI is a steering group member.

This year we made the following progress through collaboration:

- With industry stakeholders, governments, trade unions and human rights NGOs and academics, we participated in the following to improve our understanding of modern slavery risks in the seafood sector, gather intelligence on modern slavery risk and explore ways to jointly make an impact in prevent human rights breaches:
 - The Ethics Common Language Group,
 - The Indonesia roundtable on labour risks for fishers and seafood workers in Indonesia,
 - NESI and our Turkish suppliers attended a M&S conference "Working in Partnership to address Human Rights" - covering M&S's approach to Human Rights and our expectations of their suppliers and how the UK and Turkey are working together to tackle modern slavery.
 - Three webinars specific to human rights and tools to address modern slavery
 - Two SEA Alliance meetings
 - Through our role on the Technical Advisory Committee of the Responsible Fishing Scheme, we participated in nine meetings and provided significant input draft documents to deliver a revised version of the voluntary standard, incorporating standards on crew welfare and preventing modern slavery.
 - Through our steering group role on Fisheries progress.org, provided input to their draft social responsibility scorecard.
- We also collaborated in several industry only meetings relating to modern slavery and human trafficking as follows:

Participated in

20

collaborative meetings focused on ethics and modern slavery



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- Four SEA alliance steering group meetings, and lead the drafting of a workplan for the group focused on human rights
- UK Seafood Industry Alliance Meetings
- worked with other seafood businesses on the SEA Alliance steering group to develop a feasible vessel specific component of SEDEX to increase transparency and help risk assess modern slavery at vessel or fleet level. It is hoped that the seafood industry can agglomerate the information across supply chains to identify the types of fisheries that are high risk, which is a finer resolution than the current practice of risk assessing at a country level (due to limited ethical data at fishery level globally).
- Shared our experiences and due diligence approach with one less experienced foodservice customer to help them capacity build.

Measuring effectiveness

In setting policy and identifying priorities Our Ethics Committee is scoping a monitoring system to track the effectiveness of our Modern Slavery Act statements, policy, processes. We will use these in 2020 to report our progress against our commitments to prevent and tackle modern slavery. No concerns relating to modern slavery were reported through our confidential whistleblowing hotline.

In addition, the positive outcomes of third-party ethical audits of our own sites and our suppliers, which review the robustness of certain measures intended to prevent and tackle modern slavery, demonstrated our effectiveness.

Most significantly, there were no known or reported instances of Modern Slavery amongst our employees or in our supply chains in this reporting period.

Intended further steps

As described, 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. The following is our intention for continual improvement on our modern slavery work for the next year:

Type of commitment	Intended further step	Target	Key Performance Indicator
Policies	Improve representation on the Ethics Committee to	Members from our Grimsby site and wider business	Number of new representatives
	Through Ethics Committee, prioritise where can have most impact on preventing modern slavery, and agree the	Set SMART targets relating to modern slavery prevention, identification and remediation of modern slavery	



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	process for delivering this.		
	Suppliers to read and agree to Ethical trade policy. Ideally develop their own where absent	100% of seafood and ingredient suppliers to have agreed to and signed the new policy	Number of suppliers that have agreed to and signed the new policy
	Require continual improvement of our suppliers in relation to mitigating modern slavery risks	<ul style="list-style-type: none"> - Enhance supplier development criteria - Ensure our standard terms of business include statements and conditions regarding modern slavery 	No. of supply chains rolled out to
	Continue outreach internally and externally to better understand modern slavery risks.	Continue to attend SEA Alliance, eCLG, and other relevant collaborative meetings.	No. of meetings participated in on modern slavery
Due diligence	Improve the regularity and formality of supplier monitoring on our ethics requirements	<ul style="list-style-type: none"> -Enhance our supplier scorecard to include monitoring & requirements on our and expectations of our suppliers on social assurance. -Develop a process to track progress of suppliers' ethical audit results and corrective action plans -Enhanced the supplier food safety audits conducted by our own experts so that they include further monitoring of ethical activities: our audits now ask 	No or % of supply chains monitored increased no. of ethical questions than before in our enhanced food safety audits
	Improve our mapping and data capture of supply chains	<ul style="list-style-type: none"> Increase existing supply chain mapping Collect supply chain data on supporting services, labour providers and any onsite accommodation provisions for workers where possible 	No or % of supply chains achieved data collection for
	Ensure the integrity of our investigations into working conditions	Engage expert independent, third parties and civil society stakeholders to help develop a system to ensure integrity in our supply chains and own business. We will start with a	



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		focus on distant water tuna fishing fleets in 2020.	
Training	Extend modern slavery training further into our business. Increase awareness across the business using various means incl posters.	Review modern slavery training and capacity building needs in our business and supply chains Ensure regular programme of training to provide training to any key staff who were unable to attend previous sessions	% of target workforce trained Confirm understanding of key principles by incorporating questions in our annual Culture Excellence survey
	Capacity build in our supply chains on Modern Slavery risks, prevention and remediation	- Enhance supplier development criteria e.g. training in and continual improvement relating to mitigating modern slavery risks -Seek mechanism to share training learning to supply base, possibly cascade learnings from Stronger together training with direct suppliers Support or facilitate suppliers in countries identified as high risk to engage in modern slavery training. Responsible accommodation provision discussion with our suppliers where provided and identified as high risk.	Number of suppliers with specified ethics development criteria which could incl training, improvements in awareness of risk and understanding, cases of appropriate decision-making /action in cases indicating modern slavery/risk of

Signed by Dan Aherne NESI Group CEO

28th January 2020