



Purpose

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 2022 to 31st December 2022. This policy is publicly available on our website, and the government registry, and is published through The Transparency in Supply Chains Platform (TISC).

Scope:

This policy applies to both our UK sites, Grimsby and Chessington.

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 sixth 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. In February of 2022 NESI acquired two likeminded companies based in Iceland; Icemar ehf. and AGS Holding ehf. The funding of which was provided by Sealaska Group. The 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.

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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 March 2022, our previously named CSR team established itself as the Planet and People team to reflect the impact we are making on the environment and communities around the world. The team includes our Head of Social Responsibility, who gives particular focus to progress the highly important and valued work on driving ethical improvements within our supply chains. Our Planet and People Director sits on the Leadership Team, reflecting the importance of this work to the business. 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, twice 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 ethical 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 key 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.

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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. The SEAA also continues to advocate for improvements to worker welfare in fisheries globally.

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. NESI sits on two FNET working groups; Responsible Recruitment Working Group and the Climate Change Working Group aiming to help food businesses reach a Just Transition of social equality in the face of climate instability.



As part of our role on FisheryProgress’s Social Advisory Committee, throughout 2022 we joined monthly calls, and an in-person meeting in July, where our advice was sought on questions and issues arising as Fishery Improvement Projects (FIPs) gave their feedback to the human rights reporting requirements. FisheryProgress announced some changes to their policy in September which can be accessed [here](#). NESI’s Head of Social Responsibility was quoted in the newsletter that accompanied these policy changes, endorsing the need for FIPs to have clear labels showing which elements of the social policy FIPs have met or where they have requested extensions.



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 2022 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 August NESI signed an MoU and partnership with NGO Ocean Outcomes with the aim of collaborating to improve sustainability, transparency, and social responsibility in the Korean distant water tuna fishery. A workplan was developed to outline priority areas for 2023 across these three pillars.

In addition to the above memberships / committees, we provided feedback into the following public consultations and assessments throughout 2022:

- In January, we participated in the annual Global Tuna Alliance (GTA) progress survey. This determines the progress made by Partners against the 5-Year Strategy, of which a key component is

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social responsibility. The survey acts as a useful baseline for assessing current status and determining focus areas moving forward.

- 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.
- In September our Head of Social Responsibility was interviewed by a consultancy who are looking at a worker voice system for fishing vessel crew. The report containing the findings from ours, and the other 50 plus interviewees, is expected to be published in early 2023.

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 had SMETA audits in 2022 following Covid delays (as mentioned in our previous statement). The Grimsby site was audited on the 25th February and received two non-conformances and both of these were closed out within the timeframes stipulated by the auditor. The Chessington site had an audit on the 21st of March and did not receive any non-conformances.
- Both sites also updated their SAQs on the 19th of July 2022 as Sedex had added some new questions. Following this process both sites reduced their Combined Risk Scores from medium to low risk.
- Sedex’s forced labour indicator tool which was developed in May 2021 showed that there were no definite indicators of 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 8 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:

- Through our steering committee membership of the [SEA Alliance](#), our most active updates were centred around two of the key workstream areas:
 - o Human Rights Due Diligence
 - As explained in our previous statement, we were part of a small working group working on developing a Fisheries Risk Rating Tool. This tool was finalised in October and made accessible via the SEA Alliance website, to the following industry groups who had signed MOUs: the Global Tuna Alliance; the Sustainable Seafood Coalition and FNET. The creation of this tool is industry leading as it enables businesses to identify potential human rights

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risks in their supply chains and therefore prioritise where to focus their efforts to drive improvements.

- o Advocacy and engagement
 - Recognising the important role that advocacy plays in promoting equality, social justice, social inclusion and human rights, NESI's Head of Social Responsibility became the Steering Committee lead for this workstream in 2022. Key highlights in 2022 included:
 - Sending personalised communications to over 50 countries to support the ratification and implementation of the Cape Town Agreement on fishing vessel safety.
 - Developing and signing a cross-industry statement calling for the development of a global repository on fisher mortality and accidents, which was endorsed by the UN Committee on Fisheries (see [this article](#) for reference).
 - NESI's Head of Social Responsibility spoke on a panel at the Seafood Expo Global that was hosted in April in Barcelona, entitled "[making transparency on human rights the norm in seafood supply chains](#)". Alongside the four other panellists, we spoke candidly about the challenges and opportunities of increasing transparency about human rights risks, tools available for businesses and lessons learned from other sectors. The main focus of the discussion was on identifying pragmatic solutions to decrease the risk and increase the reward for disclosing human rights risks and efforts to mitigate them.
- We actively take part in workshops, webinars and events that are organised by our customer base:
 - o In July, we attended a supplier exchange event on modern slavery, hosted by one of our customers. This was a great opportunity for NESI to demonstrate how passionate we are about reducing the risk of modern slavery, and learn how we can improve from other suppliers and specialist groups.
 - o In July we were asked to present at a strategic supplier event hosted by one of our customers. We spoke about the evolution of our Planet and People strategy process, one element of which focuses on modern slavery.
- We continue to work collaboratively through our FNET membership and in 2022 we participated in groups focussed on recruitment fees, climate change, and updates to Sedex.
- We have created a cross-functional review team between Planet and People and our Procurement team to ensure we work with suppliers after each SMETA audit is conducted to understand where our support is needed and ensure non-conformances are closed.
- We require our key 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.
- 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.

Due Diligence Processes

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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 2022:

- **Planet and People Strategy Process:** As detailed in our previous statement, throughout 2021 we went through a very thorough Planet and People strategy process. In May 2022, our Head of Social Responsibility presented the results of the strategy process – from materiality to solution identification – back to the business at our monthly briefing session. This presentation ensured that the business is continuously aware of the risk that modern slavery and forced labour presents to us as a business, but also importantly the projects that we are focusing on to try and mitigate such risks. In August we took two NGOs through our strategy process, allowing them to provide critique and feedback on our process and the solutions that we had identified, as well as trying to identify potential areas for collaboration going forward. One key part of our strategy process was sending our suppliers detailed SAQs through our supplier compliance management system. The first section of this SAQ is focused on modern slavery and forced labour.
- **Supplier Training:** Supplier training was one of the projects that we identified through our strategy process as having the potential to address multiple material issues within the pillar of social responsibility. We created a 10 minute introductory video for our suppliers where we set the context and provided the rationale on why we would be sending them links to a total of six, one hour training videos covering a range of topics of social responsibility, from September 2022 through to the first part of 2023. These six training videos had been put together by the SEA Alliance, and in 2022 covered off the following topics:
 - September: setting context for human rights due diligence – what it is and why should companies engage
 - October: Human rights due diligence in depth: identify, assess, remediate
 - November: responsible recruitment

We believe that asking our suppliers to watch these videos will help us to advance our collective knowledge and understanding of current issues and priorities facing the seafood industry. We received positive feedback from suppliers who engaged through this process and we have included some information in the KPI section below. The remaining three training modules will be rolled out in 2023.
- **UK Fisheries:** The University of Nottingham published a report in May entitled [‘Letting exploitation off the hook? Evidencing labour abuses in UK fishing’](#). Although wild caught UK species make up a very small percentage (0.37%) of our business and although the report did not name any particular vessels (thereby preventing us to know if our supply chains were directly linked), we followed our usual due diligence process when a report like this is published:
 - We followed up with our supplier and asked them for their reaction and to seek reassurances. They in turn were having calls with the relevant Fish Producer Organisations to get their reaction.

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- o We followed up with the Fish Producer Organisations ourselves so that we could hear first hand about their action plans and the direct engagement they were carrying out.
 - o We updated the relevant customer who takes the British species to ensure they were aware of the report; and aware of the due diligence steps we were taking.
 - o We continued to remain engaged on this topic through the SEA Alliance which has developed a UK action plan to advocate for improvements to worker welfare in UK fisheries.
- **Yellowfin tuna:** We were able to visit the Republic of Korea in May 2022 - the first opportunity to do so, when its borders opened for the first time since Covid in 2019. This visit had many purposes – firstly it was an opportunity to visit our suppliers, along with key NGOs and other stakeholders (industry) in person and discuss matters of social responsibility face to face. Secondly, our Head of Sustainability and Head of Social Responsibility had been asked to present at the [first ever roundtable meeting](#) of Korea’s largest and most influential seafood companies at the Seoul International Seafood Show, to jointly advocate for better management and operation of key tuna fisheries in the Western and Central Pacific Ocean. Our presentation referred to the UK Modern Slavery Act as being one of the key drivers behind acting with purpose.
- **Korean fisheries:** In May, NESI wrote to the newly appointed Korean Minister of Oceans and Fisheries to highlight the importance of collaboration in addressing human rights risks in the Korean distant water fleet and to advocate for the adoption of ILO C. 188. NESI received a response to this letter from the Fisheries Minister which outlined the administration’s openness to collaboration and commitment to ensuring decent working conditions for fishing crew.
- In June our Head of Social Responsibility was interviewed by a PhD student from the School of Business and Management at Queen Mary University of London on how our business approached environmental and labour issues in the fishing sector, particularly focused on South Korea since we have had made significant advocacy efforts with our suppliers, government and industry over many years.
- In September 2022, NESI guided two of our Korean tuna suppliers on getting SMETA audited. Ethical audits were a novel process for the suppliers, and we supported them in facilitating the audit and understanding non-conformances.
- **Russian-caught seafood:** In April, our CEO received a letter from EJV and ITF seeking our position on the sale of Russian-caught seafood following on from the start of Russia’s war on Ukraine. EJV and ITF were calling on British retailers and suppliers to ensure that they made no future purchases of seafood caught by and/or processed and/or transhipped by Russian-flagged or Russian-owned vessels. We confirmed that we had no plans to purchase any new season fish beyond existing stocks from the pre-war fishing season.
- **Xinjiang, China:** In our previous statement we explained that we had discovered that the paprika we used in a dye for smoking fish products was coming from Xinjiang and that we were looking into alternative sources. In October 2022, following on from months of internal trials, we were satisfied to sign off a new source of paprika, sourced outside of China. Our paprika is now sourced from Peru, Spain, South African and India and this is also palm oil free.

Training and Capacity Building:

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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. Feedback is also taken by all employees at the end of their induction.
- All new employees are met with 3 times within their first 12 weeks of employment with their line manager and HR as a 2 way review.
- NESI also marked Human Rights Day in December 2022 by sharing communications through the business' communication platform on the Universal Declaration on Human Rights and a video which NESI created in collaboration with UK retailers, The Environmental Justice Foundation, and The Sea Alliance.

Tracking Progress:

The table below shows the progress that we have made against the commitments that we made within our 2022 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	All NESI policies and procedures are being reviewed and updated so that they align across both of our sites.	Orange
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.	Green
We will complete the Stronger Together "Progress Reporting Tool" and subsequently create an action plan with key focus areas to drive improvements	Due to resource shortages, we did not complete the tool in 2022.	Red
We will consider becoming a member of the Association of Labour Providers (ALP) to help promote responsible recruitment at our two sites	We have been an ALP member since January 2022.	Green
Become a Stronger Together Business Partner	Assessment has been completed with actions in place to monitor progress with a view to becoming a Stronger Together Business partner by 2025	Orange
We will map the non-conformances from our suppliers SMETA audits to classify the	We are monitoring non-conformances in supplier audits through our ethical strategy KPIs. These	Green

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<p>most common risks that exist across our different species and geographies, which will help us prioritise specific labour rights risks</p>	<p>are compared against ETI base code points. Now these have been mapped against the ETI base code, we will be looking for patterns within species and geographies.</p> <p>In 2022 50 audits were conducted and non-conformances fell into the below ETI categories:</p> <ol style="list-style-type: none"> 1. Employment is freely chosen: <ul style="list-style-type: none"> ● 0.8% of NCs 2. Freedom of association and the right to collective bargaining are respected: <ul style="list-style-type: none"> ● 2.09% of NCs 3. Working conditions are safe and hygienic: <ul style="list-style-type: none"> ● 50% of NCs 4. Child labour shall not be used: <ul style="list-style-type: none"> ● 1.7% of NCs 5. Living wages are paid: <ul style="list-style-type: none"> ● 6.7% of NCs 6. Working Hours are not excessive: <ul style="list-style-type: none"> ● 18.4% of NCs 7. No discrimination is practiced: <ul style="list-style-type: none"> ● 0.8% of NCs 8. Regular employment is provided: <ul style="list-style-type: none"> ● 7.5% of NCs 9. No harsh or inhumane treatment is allowed: <ul style="list-style-type: none"> ● 0.4% of NCs 	
<p>We will work with our suppliers to understand what modern slavery training they have done for their employees</p>	<p>This is one of the questions we have asked all of our first-tier seafood suppliers via a detailed SAQ.</p>	
<p>We will work with our suppliers to map the use of recruitment fees and identify hotspots, and develop action plans</p>	<p>This is one of the questions we have asked all of our first-tier seafood suppliers via a detailed SAQ.</p>	
<p>We will continue to work closely with our Korean tuna suppliers and the wider industry to verify the improvements outlined by the Korean Government</p>	<p>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.</p>	
<p>We will engage with recognised third-party certification standards</p>	<p>For vessels we engaged with RFVS and FISH Standard for Crew throughout 2022. NESI's pollock vessels achieved FISH certification in 2022. We also spoke to ASC to understand more about their social pilot projects.</p>	

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We also said that we would report back on the following KPIs in our 2023 Modern Slavery Statement, reflecting on our activities from 1 Jan 2022 – 31 Dec 2022.

KPI	2023 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 HR Team
Number of people from both sites who have completed Responsible Recruitment Training	2 members of Chessington’s HR 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 2022
% improvement made in the Stronger Together Progress Reporting Tool	See previous point.
% score achieved in the Employer Good Practice Implementation Checklist	62%
% of seafood suppliers that have completed detailed SAQs through our supplier compliance management system	41% have completed
% of seafood suppliers conducting training on Modern Day Slavery	55% of the seafood suppliers that have completed our internal SAQ. This makes up 23.40% of our total seafood suppliers

In the next 12 months (Jan – Dec 2023) 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:

- o % improvement made in the Stronger Together Progress Reporting Tool
- o % of ingredients and packaging suppliers conducting training on Modern Day Slavery

Whilst we are proud of the many steps we have taken in 2022, we recognise that much difficult work lies ahead, especially as there is ongoing economic struggles around the world due to complex geopolitical troubles. 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.

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Signed by Doug Adam, NESI Group Managing Director

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