



NEW ENGLAND SEAFOOD INTERNATIONAL RESPONSIBLE SOURCING MANAGEMENT SYSTEM

GPRBCP :: 2

Responsible Trading Charter Code of Practice

PURPOSE:

NESI's Responsible Trading Charter sets out our values, expectations, and procurement principles. These principles incorporate our customers' operating policies and commitments, which we are regularly audited against, so it is vital that we can show compliance with those requirements. Our ethos is one of continuous improvement, where we work with our suppliers to understand areas for improvement and continually strive for best practices.

NESI has, therefore, developed this Responsible Trading Charter to facilitate this journey. We expect our suppliers to aspire to this set of principles, not only in their own organisation, but also throughout their supply chains.

Suppliers to NESI are expected to support the NESI Responsible Trading Charter and conduct their operations in a responsible manner. They should acknowledge their adherence to, and flow down to their supply chains, the principles within this Responsible Trading Charter, and accompanying Codes of Practices (CoPs). If there are elements within the charter with which suppliers cannot demonstrate compliance they should inform us of the specifics, so we can attempt to fully understand any potential gaps that exist and agree how to proceed in the circumstances. We reserve the right not to commence or continue business until the gap is resolved or an agreed plan has been put in place.

Supplier status against this charter, and its accompanying CoPs will be discussed during review meetings with our suppliers so that we can evaluate the progress being made and consider how we can collaborate to drive improvements throughout the supply chain.

NESI's Responsible Trading Charter is made up of four sections, each representing a key pillar of our Responsible Sourcing strategy:

1. Our People
2. Our Sourcing
3. Our Environment
4. Our Quality

Each outline:

- The way we do business.
- The principles against which we measure ourselves and our suppliers.
- Our aspirations for improvement, with clear and specific goals where we have them.

SCOPE:

Direct suppliers of product

Issue Number	1	Prepared by	Cassie Leisk	CSR Director	Page 1 of 11
Issue Date	27.01.2023	Approved by	Cassie Leisk	CSR Director	

INTEGRITY RESPECT CUSTOMER CARE TEAM SPIRIT LEARNING WE GROW



NEW ENGLAND SEAFOOD INTERNATIONAL RESPONSIBLE SOURCING MANAGEMENT SYSTEM

GPRBCP :: 2

Responsible Trading Charter Code of Practice

RESPONSIBILITIES

Department		Responsibility
New England Seafood (NESI)		I set high standards Working with suppliers committed to sourcing products responsibly
Supplier		I ensure compliance Working in partnership with NESI and complying with all requirements in full

CONTENTS

1.	Background – About NESI
2.	Our People
3.	Our Sourcing
4.	Our Environment
5.	Our Quality

ABOUT NEW ENGLAND SEAFOOD INTERNATIONAL

New England Seafood International (NESI) was established in 1991 and is an importer and processor of premium fresh and frozen sustainable fish and seafood. NESI employs circa 650 people across two sites in the UK and imports a wide range of wild and farmed fish and shellfish from all around the world. We are part of the Sealaska Corporation, an Alaska Native corporation formed in 1971 and which is owned by 22,000 Tlingit, Haida and Tsimshian shareholders, who are bloodline descendants of the first settlers to the Americas.

We supply leading supermarkets, food manufacturers and restaurant chains nationwide and in mainland Europe.

Our core purpose is *enhancing lives through fish*. We want to ensure that NESI enhances the lives and prospects of those who work in our supply chains, those who work in our business and the communities and end consumers that we serve. Our vision, values and strategic direction all contribute positively towards this purpose.

We acknowledge that our business operations have an impact on the environment and the people and communities with whom we work. Our corporate social responsibility (CSR) approach, our company values and our purpose reflect our moral commitment to ensure that we do the right thing. We appreciate that commercial success and sustainable business depend on our ability to operate responsibly, and we expect and encourage our suppliers to follow the same path.

Issue Number	1	Prepared by	Cassie Leisk	CSR Director	Page 2 of 11
Issue Date	27.01.2023	Approved by	Cassie Leisk	CSR Director	

INTEGRITY RESPECT CUSTOMER CARE TEAM SPIRIT LEARNING WE GROW



NEW ENGLAND SEAFOOD INTERNATIONAL RESPONSIBLE SOURCING MANAGEMENT SYSTEM

GPRBCP :: 2

Responsible Trading Charter Code of Practice

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- 1. Our People** **2. Our Sourcing** **3. Our Environment** **4. Our Quality**

and each outline:

- ☐ The way we do business.
- ☐ The principles against which we measure ourselves and our suppliers.
- ☐ Our aspirations for improvement, with clear and specific goals where we have them.

1. OUR PEOPLE

We strive to build capable and empowered teams that can underpin the continued growth and success of NESI. We are a company whose employees share a team spirit, commitment, loyalty and common bond. We regard our customers and suppliers as members of our extended team. We pay fair prices, offer competitive terms and help suppliers develop their businesses. We provide employment in our community and support local people and organisations in a variety of ways. We believe we have a duty to protect livelihoods, as well as fish stocks, for future generations, and we seek to do business with suppliers who share these values.

1.1 Trading Fairly and Ethically

- 1.1.1 NESI believes in fair, open and honest trading and always seeks to develop long-term relationships with our suppliers.
- 1.1.2 We attempt to ensure everyone in our business and supply chains is safe, respected, treated with equality, and are employed legally.
- 1.1.3 We comply with the nine principles of the Ethical Trading Initiative (ETI) Base Code as a minimum and expect our suppliers to be able to evidence their commitment in this area.
- 1.1.4 We recognise that working conditions at sea are tough, so we work with suppliers who are committed to implementing best practices towards all workers and who openly engage with us on these agendas to drive improvements.
- 1.1.5 We seek continuous improvement on social issues in the seafood industry and supply chains.
- 1.1.6 We welcome the Modern Slavery Act 2015 and the legal framework it provides to prevent slavery, servitude, forced labour and human trafficking in the UK and around the world.
- 1.1.7 NESI's Modern Slavery Statement is published according to the Act, on our website.
- 1.1.8 Under the Modern Slavery Act we require all qualifying UK suppliers to provide us with copies of their Modern Slavery Statement.

Issue Number	1	Prepared by	Cassie Leisk	CSR Director	Page 3 of 11
Issue Date	27.01.2023	Approved by	Cassie Leisk	CSR Director	

INTEGRITY RESPECT CUSTOMER CARE TEAM SPIRIT LEARNING WE GROW



NEW ENGLAND SEAFOOD INTERNATIONAL RESPONSIBLE SOURCING MANAGEMENT SYSTEM

GPRBCP :: 2

Responsible Trading Charter Code of Practice

- 1.1.9 We work to comply with the ETI Base Code and work to ensure all employees in our supply chains are aware of it and can safely communicate any ethical concerns.
- 1.1.10 We are AB members of Supplier Ethical Data Exchange (Sedex), which allows us to risk assess our suppliers and define audit priorities.
- 1.1.11 We require our suppliers to demonstrate, through audit, fair and ethical treatment of their employees and other stakeholders and compliance with national regulations and ILO conventions.
- 1.1.12 NESI actively supports systems, third-party standards and technology that enhance the human rights agendas for the people who work within our supply chains. We may require suppliers to pilot such systems.
- 1.1.13 We support the International Labour Organisation (ILO)'s Work in Fishing Convention (C188), together with certain other relevant conventions such as the Cape Town Agreement and encourage our suppliers to work with governments to ratify the C188 in source countries.
- 1.1.14 We insist that suppliers disclose to us if they discover any risk to the legality of their supplies or allegations of illegal, unreported and unregulated (IUU) fishing or human rights abuses made against any supplier, including vessels and farms, in our supply chains.

1.2 Health and Safety

- 1.2.1 It is core to our purpose, values, and company policy to do all that is reasonably practicable to prevent personal injury and provide and maintain a healthy, safe working environment.
- 1.2.2 We ensure management is aware of their health and safety responsibilities through multiple touchpoints and daily, weekly and monthly interactions.
- 1.2.3 We ensure that employees are aware of, and are encouraged to accept, their individual responsibilities for the health and safety of themselves and others.
- 1.2.4 We ensure that visitors, contractors and suppliers comply with the relevant health and safety legislation, as well as site rules and procedures.
- 1.2.5 We ensure that the site complies with legal requirements of health and safety legislation through effective and appropriate policies and procedures.
- 1.2.6 We assess risks and then look to eliminate or reduce them, and we expect suppliers to do the same.
- 1.2.7 We are brave in confronting underlying cultural traits or behaviours that may block our efforts to improve health and safety on our sites.

1.3 Fair and Equal Employer

- 1.3.1 We strive to promote the highest level of employee conduct and ethical behaviour and believe that all people must be treated with dignity and respect.

Issue Number	1	Prepared by	Cassie Leisk	CSR Director	Page 4 of 11
Issue Date	27.01.2023	Approved by	Cassie Leisk	CSR Director	

INTEGRITY RESPECT CUSTOMER CARE TEAM SPIRIT LEARNING WE GROW



NEW ENGLAND SEAFOOD INTERNATIONAL RESPONSIBLE SOURCING MANAGEMENT SYSTEM

GPRBCP :: 2

Responsible Trading Charter Code of Practice

- 1.3.2 Employment should be freely chosen. We encourage all our workers, customers and suppliers to report any concerns about modern slavery or human trafficking that may relate to our activities or supply chains.
- 1.3.3 We use only reputable employment agencies to source our labour. Each one complies with the standards of the Ethical Trading Initiative (ETI) base code and actively promotes the principles of the Modern Slavery Act 2015.
- 1.3.4 We do not employ or contract with workers under the age of 18.
- 1.3.5 Our whistleblowing procedure is designed to make it easy for colleagues to disclose information in complete confidence and without fear of retaliation.
- 1.3.6 We believe that all our people, including those in our supply chains, should be represented, included and respected, whatever their gender, ethnicity, nationality, race, religious or political beliefs, education, socioeconomic background, disability, sexual orientation or geographic location.
- 1.3.7 We are committed to ensuring that everyone feels welcome, no one feels vulnerable and that everybody can thrive and contribute equally, regardless of who they are, where they come from or what they are going through.
- 1.3.8 We believe that everyone deserves to be treated with fairness, respect, and dignity, free from abuse and violation. We do not tolerate abuse of human rights within any part of our business or supply chain.
- 1.3.9 Our Codes of Conduct help us ensure that we all go about our business in a responsible way.

2. OUR SOURCING

2.1 Sustainable and Responsible Seafood

Sustainable, responsible, and ethically sourced seafood is at the core of NESI, and we are committed to working with suppliers to achieve high sustainability standards in seafood. We require continuous improvement towards delivering these standards from our suppliers.

- 2.1.1 We strive to work with progressive suppliers to source products carrying credible third-party certification (including Marine Stewardship Council certification for wild caught species and Aquaculture Stewardship Council certification, Global Gap or Best Aquaculture Practices certification for farmed species). Certification gives us assurance of the sustainability status of the seafood we buy.
- 2.1.2 We work with suppliers that are committed to implement high seafood sustainability standards and achieve certification against these standards. We work collaboratively to support our suppliers through the certification assessment process, and where standards are not currently being met, we support our suppliers to improve and through credible and transparent projects, typically in either a Fishery Improvement Project (FIP) or Aquaculture Improvement Project (AIP).

Issue Number	1	Prepared by	Cassie Leisk	CSR Director	Page 5 of 11
Issue Date	27.01.2023	Approved by	Cassie Leisk	CSR Director	

INTEGRITY RESPECT CUSTOMER CARE TEAM SPIRIT LEARNING WE GROW



NEW ENGLAND SEAFOOD INTERNATIONAL RESPONSIBLE SOURCING MANAGEMENT SYSTEM

GPRBCP :: 2

Responsible Trading Charter Code of Practice

- 2.1.3 We will not source species IUCN-classified as ‘Endangered’ or ‘Critically Endangered’ to prevent further pressure on any under-threat species.
- 2.1.4 We will not buy seafood that has been caught using illegal fishing methods (including poison or dynamite).
- 2.1.5 We work with innovative suppliers who recognise the need for best practices, such as minimising environmental impact and prioritising fish health and welfare.
- 2.1.6 Our ambition is that all fish meal and fish oil used in feed by our aquaculture suppliers will be third-party certified to a credible standard by 2025.
- 2.1.7 We work closely with our suppliers to minimise any environmental impacts of sourcing fish feed ingredients. Working with our suppliers, we are committed to using only sustainably sourced, and deforestation and conversion-free soya by 2025.
- 2.1.8 We recognise the ‘Five Freedoms’ for animal welfare and seek aquaculture suppliers’ commitment to humane slaughter methods and robust health management, including responsible veterinary health plans, to promote healthy farmed fish.
- 2.1.9 Recognising there are many industry-wide challenges, we work in pre-competitive advocacy with stakeholders across the seafood sector. For example, we are founding members of the Global Tuna Alliance (GTA), which works to bring responsible businesses together to collaborate to resolve issues specific to tuna sustainability.
- 2.1.10 We strongly believe in the importance of sourcing from healthy fish stocks and work closely with stakeholders and decision makers to improve stock health and management where required. NESI therefore advocates for the implementation of effective harvest strategies and calls on its suppliers to engage in these advocacy efforts.

2.2 Ecosystem Impact

- 2.2.1 Our fishery approval process takes an Ecosystem Approach to Fisheries Management (EAFM) as this promotes the sustainable use of the whole relevant ecosystem. This means we actively support the adoption of best practice measures to reduce possible impact on endangered, threatened and protected (ETP) species.
- 2.2.2 We will not allow illegal shark finning to take place in our supply chains, nor work with suppliers that have links with commercial whaling or seal culling.
- 2.2.3 We are committed to ensuring that, where applicable, our suppliers implement Fins Naturally Attached (FNA) policies by 2024 to further mitigate the risk of shark finning in our supply chains.
- 2.2.4 We require our aquaculture farming suppliers to manage their environmental impact through continuous monitoring, best practices and by following strict standards for aquaculture to avoid the risk of negative effects on the environment.

Issue Number	1	Prepared by	Cassie Leisk	CSR Director	Page 6 of 11
Issue Date	27.01.2023	Approved by	Cassie Leisk	CSR Director	

INTEGRITY RESPECT CUSTOMER CARE TEAM SPIRIT LEARNING WE GROW



NEW ENGLAND SEAFOOD INTERNATIONAL RESPONSIBLE SOURCING MANAGEMENT SYSTEM

GPRBCP :: 2

Responsible Trading Charter Code of Practice

2.2.5 We recognise the merits of engagement at all levels and positively seek out suppliers who are also willing to join the debate on all the subjects contained in this trading charter. This includes governments, policymakers, NGOs and civil society, fishery managers, supply chain associations and the fishers themselves.

2.3 Legal and Traceable

- 2.3.1 We require visibility and transparency of the supply chains that we source from, including fishery, farm and vessel operations and workers' conditions, on land and at sea.
- 2.3.2 We require that all products supplied to NESI are legal and traceable back to origin. We use PAS 1550 as a guide to underpin our due-diligence efforts to remove the risk of any Illegal, Unregulated and Unreported (IUU) seafood from entering our supply chains and meet our legal obligations under the requirements of the EU IUU Regulation.
- 2.3.3 We require that suppliers provide details on the source fishing vessels or farms, as this demonstrates catch and origin legality and allows us to perform our own due diligence processes, if necessary. Catch certificates are also required to allow us to trace products back to our approved vessels or fisheries.
- 2.3.4 We support the publication of Authorised Vessel lists, provided by the supplying countries and Regional Fisheries Management Organisations (RFMOs) that we source from, to help ensure the fishing vessels supplying NESI remain compliant.
- 2.3.5 We work to track every vessel that we supply from and request that all supplying fishing vessels have Vessel Monitoring Systems (VMS) or Automatic Identification Systems (AIS) fitted onboard the fishing vessel where reasonably possible.
- 2.3.6 We encourage transparency in our supply chains and support the use of electronic monitoring to verify environmental performance of our supply chains.
- 2.3.7 We note some fisheries have a need for increased monitoring, such as longline tuna vessels, and we have an ambition to have 100% observer coverage (human and/or electronic) onboard the tuna fishing vessels that we source from. Working with our tuna suppliers, our goal is to increase observer coverage towards 100% by 2024.
- 2.3.8 We will show preference to sourcing from countries which have implemented the Port State Measures Agreement (PSMA).
- 2.3.9 We support and embrace information technology to improve transparency and traceability in supply chains. We support traceability of robust end-to-end digital systems and support the principles of the Global Dialogue on Seafood Traceability (GDST). We expect suppliers to capture all Key Data Elements (KDE) identified by GDST, with the aim of working towards GDST implementation.

Issue Number	1	Prepared by	Cassie Leisk	CSR Director	Page 7 of 11
Issue Date	27.01.2023	Approved by	Cassie Leisk	CSR Director	

INTEGRITY RESPECT CUSTOMER CARE TEAM SPIRIT LEARNING WE GROW



NEW ENGLAND SEAFOOD INTERNATIONAL RESPONSIBLE SOURCING MANAGEMENT SYSTEM

GPRBCP :: 2

Responsible Trading Charter Code of Practice

3. OUR ENVIRONMENT

NESI's values reflect that the long-term viability and value of all seafood businesses ultimately depend on sustainable and environmentally responsible interactions with our global ecosystem. We commend multi-stakeholder engagement to encourage best practices and encourage all our suppliers to implement our environmental goals and ambitions.

3.1 Environmental Impact

- 3.1.1 We support the UK Government's target to reach net zero by 2050 and are in the process of setting our carbon reduction targets using a science-based approach.
- 3.1.2 To support our net zero ambition, we measure and record our greenhouse gas footprint and are working to conduct life cycle analyses on our products.
- 3.1.3 We support the use of renewable energy, and voluntarily generate renewable electricity on site, as well as purchase renewables from the national grid through the Renewable Energy Guarantees of Origin (REGO) scheme.
- 3.1.4 We strive to understand and minimise our environmental impact, both in terms of our direct impact, as well as through our supply chains. Our environmental strategy incorporates the following areas of focus: emissions, plastic, food waste, water, industrial waste, biodiversity, and deforestation.
- 3.1.5 We work to minimise the use of packaging as far as reasonably possible within the technical constraints of our product requirements, integrating recycled and recyclable material, where safe and commercially viable.
- 3.1.6 We aim to only use materials that contain as much recycled content as possible. This includes removing problematic and single use plastics.
- 3.1.7 We want to ensure that any packaging used for products we sell is clearly labelled to facilitate recycling and sorting and will continue to look for ways to improve this.
- 3.1.8 We strive to use paper and wood-based packaging that is certified by the Forest Stewardship Council (FCS), is not bleached, and does not come from areas that were deforested or converted after 2018, or from high-conservation-value forests.
- 3.1.9 We map our palm oil supply chains to reduce the presence of deforestation and conversion. This involves ensuring affected products are certified by the Roundtable on Sustainable Palm Oil and asking for proof of origin.
- 3.1.10 We align with the UK Government's food waste hierarchy by prioritising prevention methods, redistributing where possible, and utilising anaerobic digestion to convert waste into energy. We are also a signatory of the UK's Waste and Resources Action Program (WRAP)'s roadmap to disclose our food loss and waste data.

Issue Number	1	Prepared by	Cassie Leisk	CSR Director	Page 8 of 11
Issue Date	27.01.2023	Approved by	Cassie Leisk	CSR Director	

INTEGRITY RESPECT CUSTOMER CARE TEAM SPIRIT LEARNING WE GROW



NEW ENGLAND SEAFOOD INTERNATIONAL RESPONSIBLE SOURCING MANAGEMENT SYSTEM

GPRBCP :: 2

Responsible Trading Charter Code of Practice

- 3.1.11 We have an ambition to reduce water use as much as possible in our operations and monitor our water usage to determine where losses are occurring and prevent leakages. This includes monitoring our wastewater to reduce the risk of pollutants entering natural waterways.
- 3.1.12 Our ambition is that 100% of waste produced at NESI is diverted from landfill. We avoid the production of hazardous waste because all chemicals used in our operations are fit for human consumption.
- 3.1.13 We support the circular economy model, maximising the value of resources by keeping them in use for as long as possible.
- 3.1.14 A continual review of our manufacturing footprint ensures our logistical efficiency remains a point of focus. We challenge our suppliers to minimise the environmental impact associated within their own operations and the materials we require from them.

3.2 Efficient Use of Resources

- 3.2.1 One of our core strategic pillars is to maximise the value of every kilogram of fish caught or harvested. The business invests in and strives for improved yields as well as identifying solutions and product development that make more of the “co-product.”
- 3.2.2 When developing new products, we make a conscious effort to use as little of the raw material as possible, maximising the value of every catch and minimising the impact on fisheries.
- 3.2.3 We see each of our supplier-customer relationships as a team effort to improve sales forecasting, minimise overproduction and store wastage.

4. OUR QUALITY

We place utmost importance on food safety, quality, legality and authenticity. We select our suppliers carefully, working collaboratively with a common goal and shared values to consistently deliver safe product.

4.1 Safe Products

- 4.1.1 We aim to lead in supplying the UK retail and foodservice markets with our range of high-quality seafood products, using the best quality fish and ingredients and embedding safe practices into our ways of working.
- 4.1.2 This is all underpinned by our use of globally recognised standards, such as British Retail Consortium (BRC) and other Global Food Safety Initiative (GFSI) recognised schemes. We expect our suppliers to follow these standards, alongside transparent supply chains and robust traceability systems designed using the latest technology and thinking. We regularly share this information with our customers to build further trust and confidence in our well-managed supply chain.

Issue Number	1	Prepared by	Cassie Leisk	CSR Director	Page 9 of 11
Issue Date	27.01.2023	Approved by	Cassie Leisk	CSR Director	

INTEGRITY RESPECT CUSTOMER CARE TEAM SPIRIT LEARNING WE GROW



NEW ENGLAND SEAFOOD INTERNATIONAL RESPONSIBLE SOURCING MANAGEMENT SYSTEM

GPRBCP :: 2

Responsible Trading Charter Code of Practice

- 4.1.3 Providing safe-to-eat seafood requires strong, well-defined standards managed by our passionate, skilled team members. In line with our vision of being chosen for our plate to sea eXpertise, we share knowledge with our suppliers and, throughout the process, learn from them too.
- 4.1.4 We create a positive behaviour towards food safety and quality that is owned with pride and consistently able to deliver a strong food safety culture. We expect everyone in NESI and our supply base to adopt this same behaviour.
- 4.1.5 We measure key parameters throughout the supply chain to confirm our standards are being met and to help us and our suppliers make continuous improvements.
- 4.1.6 NESI is a continually evolving business that uses a wide range of third-party expertise to help drive improvements, alongside regular reviews with our key suppliers.

By embracing these commitments and working in partnership with our suppliers, we deliver safe quality product to our customers that allow us to grow a stronger, more profitable end-to-end business capable of achieving our long-term vision and core purpose.

4.2 Consumer Led

- 4.2.1 We place the consumer at the heart of our business. We increasingly invest in shopper data and research to better understand the motivations for buying and consuming fish.
- 4.2.2 We use this understanding to create a consumer-led category vision that is our compass for building strategies, products and initiatives that both sell more fish and grow the overall category.
- 4.2.3 We believe that this consumer-led, data-driven category approach is the best way to encourage people to eat and buy more fish, ultimately leading to business growth, both for us and our customers.
- 4.2.4 We believe that a combination of insight-led challenger consumer brands and high-quality retailer brands has the greatest potential to unlock category growth.
- 4.2.5 Our brands will “tell the story” of our amazing species, attracting new shoppers into the category and supporting our dream of UK consumers eating at least two portions of fish per week, in line with NHS guidance.
- 4.2.6 We seek suppliers who share our vision of enhancing lives through fish and who will support our category growth aspirations.

By signing below,

I, < _____ >, on behalf of
< _____ >, acknowledge that I have read, understood and agreed to NESI’s trading charter; specifically, the way NESI does business, the principles and standards

Issue Number	1	Prepared by	Cassie Leisk	CSR Director	Page 10 of 11
Issue Date	27.01.2023	Approved by	Cassie Leisk	CSR Director	

INTEGRITY RESPECT CUSTOMER CARE TEAM SPIRIT LEARNING WE GROW



NEW ENGLAND SEAFOOD INTERNATIONAL RESPONSIBLE SOURCING MANAGEMENT SYSTEM

GPRBCP :: 2

Responsible Trading Charter Code of Practice

against which NESI measures its suppliers and NESI's aspirations for its suppliers to demonstrate continuous improvement.

Signed:

Job Title:

Date:

Issue Number	1	Prepared by	Cassie Leisk	CSR Director	Page 11 of 11
Issue Date	27.01.2023	Approved by	Cassie Leisk	CSR Director	

INTEGRITY RESPECT CUSTOMER CARE TEAM SPIRIT LEARNING WE GROW