Modern Slavery Statement

2024

Northcoast Seafoods Limited

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015. It sets out the steps taken by Northcoast Seafoods Limited to prevent modern slavery and human trafficking in its own business operations and supply chains for the period between January 1st to December 31st, 2023.

INTRODUCTION

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another to exploit them for personal or commercial gain. Northcoast Seafoods, have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all our contractors, suppliers, and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

The Northcoast Seafoods Forced Labour and Remediation Policies apply to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

OUR ORGANISATION, STRUCTURE, AND SUPPLY CHAIN

Northcoast Seafoods was founded in the year 2000, operating in Grimsby (UK), as a small sales and marketing company for cold water prawns, whitefish, and speciality seafood products. In 2018, Northcoast acquired Ambassador Seafoods Limited, a frozen seafood factory also based in Grimsby. The two companies remained separate entities until December 2020 when the sales and marketing business was merged with the manufacturing operation, supplying UK retailers with a wide range of frozen added-value products.

Since early 2022, Northcoast Seafoods has been owned by Maruha Nichiro the World's No.1 fishery company. Established over 130 years ago in Japan, Maruha Nichiro comprises of 153 group companies, spanning 70 countries and regions across the globe, employing over 12,000 people. Northcoast Seafoods is one of three companies in the Maruha Nichiro group operating in Europe and has fostered a strong working relationship with Netherlands based 'sister' company, Seafood Connections BV.

With continued growth over the 24 years since its establishment, Northcoast Seafoods now employs over 100 permanent workers in our offices and factory located in Grimsby. The company continues to primarily operate as an agent and broker sourcing cold water prawns, whitefish, and speciality seafood products for UK retailers. Our secondary activity is the processing of seafood products for UK retailers in our purpose-built factory .

Our supply chain includes 73 suppliers, operating from 79 sites across 15 countries, many of whom have been our suppliers since the company was established. We work in partnership with our suppliers to foster a shared commitment to the tackling of modern slavery.

POLICIES AND MODERN SLAVERY GOVERNANCE

Northcoast Seafoods Ethical Trading Code of Practice demonstrates our commitment to the maintenance, evaluation, and continuous improvement of standards in accordance with national and international laws, including the International Bill of Human Rights and the International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work.

Our internal policies and procedures are endorsed by the Finance Director/Managing Director, who has overall responsibility for ensuring compliance with our legal and ethical obligations. The Financial Director Designate (FDD) has primary and day-to-day responsibility for implementing our policies and procedures which are in place to help detect, prevent and remedy forced labour. Policies which include:

- Ethical Trading Code of Practice
- Anti-bribery & Corruption
- Forced Labour
- Remediation
- Responsible Recruitment of Workers
- Whistleblowing Policy

Management at all levels are responsible for ensuring those reporting to them understand and comply with our policies and are given adequate and regular training to ensure that human rights abuses will not occur within our business or supply chain, because of insufficient knowledge or understanding of Modern Slavery.

DUE DILIGENCE AND MANAGEMENT OF RISK

Salient risks to human rights have been identified within the Northcoast Seafoods operation, and include discrimination, fair wages, forced labour, freedom of association, harassment, health, and safety, working hours and child labour.

Northcoast Seafoods is an 'A/B' (Supplier/Buyer) member of the Supplier Ethical Data Exchange (Sedex), which is a member organisation for businesses committed to the continuous improvement of their ethical compliance mechanisms. Our ethical management systems have therefore been developed around the ETI Base Code and are audited against its standards.

On site we have an Employee Committee which comprises of 11 elected representatives, covering all worker groups. All members of the Employee Committee have received training to support the business' commitment to tackle modern slavery and worker exploitation.

Our key suppliers are required to become members of Sedex and provide us with visibility of their self-assessment questionnaires and audit information to help us understand and mitigate risk in our supply chains. Supplier performance is actively monitored, and risk assessed through the Sedex platform. Supplier performance is shared with key stakeholders within the business to ensure that we give support where needed and that any non-conformances identified after each SMETA audit are closed within the timeframe stipulated.

All labour providers used by our site are licensed by the Gangmasters and Labour Abuse Authority (GLAA) and are audited as a minimum every 12 months. The audit has been written in line with the ETI Base code, with specific sections related to the recruitment and induction process, identity checks, employment is freely chosen, freedom of association, young workers, wages, working hours, grievance procedures, housing, transport, and worker interviews.

TRAINING AND AWARENESS

Northcoast acknowledge that the prevention of modern slavery and worker exploitation within our own organisation and our supply chain requires companywide awareness, and specialist training for employees responsible for ensuring compliance with our legal and ethical obligations.

... continued overleaf.

Within the period of this statement an inhouse training course entitled 'An Introduction to Ethical Compliance' has been delivered to all employees of Northcoast Seafoods by the HR Team. The training covers all nine provisions of the ETI Base Code and guidance on how to spot the signs of modern slavery and available reporting mechanisms, to develop an understanding of modern slavery and exploitation risks within the UK.

To build awareness of modern slavery and worker exploitation, leaflets and posters in all worker languages have been displayed and made available across site. Information has been shared within the business and its supply chain, to ensure that all workers have access to anonymous reporting mechanisms to tackle modern slavery.

KEY PERFORMANCE INDICATORS

Our zero-tolerance approach to modern slavery is communicated to all employees of Northcoast Seafoods during their induction, and to all suppliers, contractors, and business partners at the outset of our business relationship with them.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment due to reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

The reporting mechanisms in operation at Northcoast Seafoods support our commitment to tackle modern slavery and provide us with a measurement of our effectiveness in this area.

The HR Team will continue to use the Responsible Recruitment Toolkit (RRT) and the Stronger Together Progress Reporting Tool (PRT), we will use these to measure the effectiveness of our resourcing practices and progress made in addressing modern slavery risks.

Training of all Northcoast employees on forced labour detection, prevention and remedy will continue throughout 2024 to ensure that 100% of the workforce are trained.

AUTHORISED BY

This statement was approved for on behalf of Northcoast Seafoods Limited.

Adrian Crookes
Finance Director / Managing Director

Date: 01 February 2024