



NEW ENGLAND SEAFOOD INTERNATIONAL People Management System

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Modern Slavery Statement 2024

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 2023 to 31st December 2023.

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 seventh 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. In March 2023, the Sealaska Group acquired a majority stake in Normarine AS, a Norwegian business focussed on the purchase and sale of frozen fish to international markets. 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 26,000 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 23 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 700 people with over 30 different nationalities.



We pride ourselves on taking a partnership approach with our suppliers; many of whom have been our suppliers since the business was founded 33 years ago.



We do not own or operate any fishing vessels.

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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 People teams at our sites.

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
- Social Responsibility Code of Practice – applicable to NESI’s first tier food and food packaging 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.

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.

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Sedex 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.

seafish We sit on the Steering Committee of the Seafood Ethics Action Alliance (SEAA), and we are part of the Seafish Seafood Ethics Common Language Group (SECLG). Both groups seek to strengthen human rights due diligence throughout the global seafood supply chain, and ensure respect for human rights. NESI’s Head of Social Responsibility assumed position of SEA Alliance Advocacy and Engagement Working Group Lead following her return to work in September.

FNET 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 and Human Rights Working Group aiming to help food businesses reach a Just Transition of social equality in the face of climate instability.

FISHERY PROGRESS.ORG NESI continued to be a member of FisheryProgress’s Advisory Committee throughout 2023. The advisory committee supports the day-to-day operations of FisheryProgress, including guiding the outreach strategy for the site, managing the appeals process, maintaining the standard for the website, and responding to emerging opportunities and challenges.

In addition to the above memberships / committees, we provided feedback into the following public consultations, assessments and meetings throughout 2023:

- In March, 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 social responsibility. This was the second survey that we have completed, and we scored 57% on the topic of social responsibility.
- In November, NESI’s Planet and People Director represented NESI speaking at the following event at Fishmongers Hall - Promoting UK leadership to advance transparency in fisheries - alongside speakers from the UK Government, EIJ and Global Fishing Watch. The panel all agreed on the importance of transparency to combat illegal fishing and human rights abuses and noted reasons why the UK should make more progress in this field.

Risk assessment, prevention, and mitigation

We risk assess, prevent, and mitigate risk of modern slavery across our own sites in the following ways:

- We undertake SMETA audits at our UK sites every two years. Both sites were last audited in 2022 - Our Grimsby site received two non-conformances and both of these were closed out within the timeframes stipulated by the auditor; our Chessington site did not receive any non-conformances.

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- 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 for the reporting period that the tool is set to (January – August 2023).
- 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. After a significant expansion in Grimsby, the site is currently recruiting additional members to its already active Site Engagement Forum (SEF) in order to achieve a more balanced representation across all functions and shifts.
- All labour providers used by both our sites hold a GLAA licence and are audited as a minimum every 6 months.

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:
- Human Rights Due Diligence:
 - As outlined in our previous statement, we were part of a small working group working on developing the SEA Alliance Fishery Risk Tool. This tool was finalised in October 2022 and made accessible via the SEA Alliance website and to the following industry groups who had signed MOUs: the Global Tuna Alliance; the Sustainable Seafood Coalition and FNET. In 2023 the tool was updated using data from several indices and ratings systems. The focus for assessment is human trafficking, forced labour and child labour. This assessment is intended to represent the first step in a risk assessment process conducted by businesses and does not constitute a thorough analysis of all factors likely to contribute to risk.
 - In July, the SEA Alliance organised a meeting focused on ethical standards within the Alaskan salmon industry. The seasonal nature of this supply chain can pose risks to human rights, notably around long working hours and reduced rest breaks. It was therefore important for the SEA Alliance to hear from the industry itself to understand current status. The Alaska Fisheries Development Foundation attended alongside one of our Alaskan suppliers who updated on current best practice in Alaska and the different laws they have. In 2024 we will continue to try and increase the number of suppliers undertaking SMETA audits and we will also explore beyond audit technology.
- Advocacy and Engagement
 - NESI attended a SEAA meeting focused on improving UK advocacy for migrant workers on vessels following a Financial Times investigation into allegations of human rights abuses in the Northern Irish fishing industry that was published in June.
 - One of the key areas of focus of the SEA Alliance Advocacy group is to engage with standards and certification bodies on how they address human rights/labour standards and, as such, NESI (along with 14 other companies) completed a survey with 7 questions around MSC’s current coverage of labour standards and the future direction of MSC’s work in this area. The survey was shared with MSC in November.
- We actively take part in workshops, webinars and events that are organised by our customer base:
 - In May we observed a cooking workshop hosted by one our customers and the UK charity Causeway as part of their programme to support victims of Modern Day Slavery in the UK.

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We are planning to recreate these workshops ourselves, in partnership with Causeway, in 2024.

- In June we attended a strategic forum hosted by one of our customers which focused on due diligence, building resilience, and mitigating risk. There were key speakers from the Ethical Trading Initiative and Stronger Together as well as collaborative workshops for suppliers to share challenges and best practice.
- We continue to work collaboratively through our FNET membership and in 2023 we participated in groups focussed on recruitment fees, climate change, and updates to Sedex.
 - In May, we attended the All-Members Day Meeting where we collaborated with other food businesses to understand risks posing the industry from a human rights perspective. Key topics included the Just Transition, seasonal supply chains which pose unique risks, and how to engage key stakeholders on human rights.
 - We presented at the FNET Climate Change and Human Rights Working Group in October as the group assessed how various public tools could be used to gain insights into the human rights risks posed by climate change in our various supply chains.
- All of our key suppliers are required to be 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. In 2023 we developed a live tracker which is shared with the procurement team so they have oversight of SMETA audit results which they can use to further support suppliers and make improvements.
- 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. Whilst our ambition is to be sourcing from 100% certified fisheries/farms, in 2023 100% of our wild seafood supply came from MSC fisheries and around 50% of our farmed seafood came from ASC certified farms. 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.
 - In 2023, the MSC made some policy updates, most notably by removing forced and child labour clauses from the Standard, including them instead in the standalone [MSC Labour Eligibility Requirements](#) document which came into effect on 1st May 2023.
 - The ASC's [Feed Standard](#), although launched in June 2021, became effective on 14th January 2023, and provides the most comprehensive human rights and labour requirements of all their standards so far. It also includes a Country Risk Scorecard that assigns a social risk level to 184 countries. This guides feed producers on how much due diligence they must carry out in sourcing ingredients from different countries.

Due Diligence Processes

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 2023:

- **Planet and People Strategy Process:** As detailed in our previous statements, we refresh our Planet & People strategy annually to ensure that the material issues we cover are still the most salient

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areas to focus on. We shared our refreshed strategy with our retail customers at the beginning of 2023 calling out Presence of Forced Labour Indicators, Workers Paying Recruitment Fees, and Existence of Discrimination as our top areas of focus for the year. Our Social Responsibility Code of Practice – applicable to NESI’s first tier food and food packaging suppliers – was rolled out to our suppliers, along with an SAQ to help us understand supplier progress against our most material issues. We improved the wider business understanding of these issues by developing an internal webpage specifically focused on human rights to ensure the business is aware of the issues we face. NESI’s Head of Social Responsibility spoke at the all company monthly briefing in November on the topic of Modern Slavery, particularly focusing on NESI’s strategy and the due diligence processes we undertake to eliminate modern slavery at our sites and within our supply chain.

- **South Korea:**
 - The Environmental Justice Foundation (EJF) published a report in April entitled [“The broken barrier: how illegal fishing and human rights abuses in Korea’s fisheries imports go undetected”](#), highlighting risks of illegal, unreported, and unregulated (IUU) seafood. There is research to suggest that supply chains at risk of IUU are also at risk of human rights violations given the illegal nature of this practice and the lack of transparency. As an importer of Korean tuna, NESI ensured our supply chains met the recommended actions laid out in the report which included checking our catch certificate data which we receive with every purchase and we concluded that we met 100% of the NGO recommendations for best practice.
 - In May, EJF published a briefing entitled [“Korea’s Migrant Fishers Plan fails to end human rights abuses at sea.”](#) The briefing is a follow up to the briefing that EJF and APIL published in 2020, and it focuses on how the measures introduced in 2021 to protect migrant fishers in the Korean DWF have failed to improve working conditions and calls for urgent reform to safeguard migrant fishers on Korean owned and Korean flagged vessels.
 - The two EJF reports really reinforced the importance of our continued due diligence efforts in Korea which have been outlined in previous modern slavery statements. The MoU that we signed with Ocean Outcomes in 2022 defined a work plan, one such element was social responsibility. NESI’s CEO, MD, Head of Tuna Procurement and Planet and People Director travelled to Korea in September to meet with suppliers and other key stakeholders to discuss the worker welfare issues identified in the EJF report and to set out our continued expectation of continuous improvement going forward. NESI’s Head of Social Responsibility subsequently went to Korea in November to pick up on the actions identified in the September visit by meeting with suppliers, industry and with EJF Korea.
- **UK Fisheries:** Although sourcing of wild UK species only made up 0.23% of total seafood purchases in 2023, as a UK based processor of seafood, we recognise the importance of adding our voice to the asks on UK fishing industry following on from the human rights expose that was published in 2022. As such, we took part in a one off exercise where we submitted information to the SEA Alliance on the >10m UK based vessels that we source from. A third party organisation analysed the submissions with the intention of identifying commonalities of sourcing to identify leverage; to engage with the common vessels and collect additional data / information that can inform due diligence/risk assessment/insight and determine the right questions to be asking supply chain owners and vessels to inform due diligence / risk assessment.
- **Outlaw Ocean:** In October 2023, [The Outlaw Ocean Project](#) published their output of their four year investigation “China: the superpower of seafood” in two parts: 1) Crimes on the boats: a fleet prone to captive labour and plunder; and 2) Crimes along the coast: the Uyghurs forced to process

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the world’s fish. The investigations focus on working conditions on China’s distant water fleet as well as conditions at inshore seafood processing sites in China. The ‘Crimes on the boats’ investigation exposes issues that have – sadly – been documented to be prevalent in many global fisheries; whereas the ‘Crimes along the coast’ investigation gives alleged evidence of state imposed forced labour. Unlike many other NGO reports, the Outlaw Ocean reports name the vessels and the processing sites where they have uncovered illicit behaviour. Although neither the processing site that we use in China, nor the Chinese flagged vessels that we source from were named in the reports, we recognised the heightened risk that this supply chain now posed to us, and as such, we engaged with both the Chinese based processing site and our supplier with the Chinese flagged vessels to understand areas of risk and areas where we could implement some direct action. Our CEO took the opportunity to write to the new CEO at the processing site in China, outlining NESI’s values and our expectations on social due diligence, particularly highlighting the Outlaw Ocean reports. Additionally, we had meetings with our tuna procurement team and Leadership Team to outline our tuna sourcing strategy and created a briefing paper which we shared with relevant customers.

Training and Capacity Building

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 Modern Slavery, and Stronger Together including spotting the signs, and what to do if you have any concerns, the ETI base code and how we comply with it across our sites. The induction also covers an overview of our policies and procedures, along with the terms and conditions of employment. It is important for all our colleagues to fully understand their rights, and to understand what to do if they believe there is any wrongdoing, so we also cover off Whistleblowing.
- All of the above are regularly re-communicated around sites through notice boards, TV screens and in quarterly factory briefings which take place face to face.
- Following on from our participation at the Ingredients for Life session hosted by one of our customers, we started to build our own relationship with the charity that developed these sessions: Causeway. After explaining to Causeway that we wanted to host our own Ingredients for Life sessions as we recognised the capacity building opportunity this presented to us as a business, and the alignment to our core purpose of ‘enhancing lives through fish’, we attended Causeway’s Fundraising Gala in September which was a brilliant opportunity for us to hear about the range of people they support. In December, we were really pleased that both of our NESI sites in the UK received Causeway’s [LifeSupply](#) bins, offering a way for NESI colleagues to donate items to victims of modern slavery.
- NESI marked Anti Slavery Day on 18th October by publishing an article which the entire company could see, raising awareness of human trafficking and modern slavery, as well as highlighting the brilliant work that Causeway do with survivors of modern slavery, explaining that people would hear more about Causeway over the next few months.

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Tracking Progress:

The table below shows the progress that we have made against the commitments that we made within our 2023 modern slavery statement:

What we said we'd do	Status & future ambitions	R/A/G																														
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. We have a dedicated noticeboard about Causeway in the reception area at our sites, which helps raise awareness of Modern Slavery and the Causeway LifeSupply donation bins are available for people to donate toiletries and other personal products to victims of the modern slavery that Causeway works with. We will continue to explore other ways in which we can get involved with Causeway throughout 2024.																															
We will complete the Stronger Together "Progress Reporting Tool" in 2023 and subsequently create an action plan with key focus areas to drive improvements	Reporting completed and score increased from 31% from our first submission in 2021 to 53% in 2023																															
Become a Stronger Together Business Partner by 2025	Assessment has been completed with actions in place to monitor progress and we are on track to apply in mid 2024.																															
We will map the non-conformances from our suppliers SMETA audits to classify the most common risks that exist across our different species and geographies, which will help us prioritise specific labour rights risks	<p>We are monitoring non-conformances from our first tier seafood, ingredients and packaging supplier audits against the ETI base code. Data shown below is 2023 (32 audits) vs 2022 (50 audits):</p> <div style="text-align: center;"> <p>% Non-Conformances against each ETI Basecode Category found in 2023 VS 2022 SMETA Audits</p> <table border="1"> <caption>% Non-Conformances against each ETI Basecode Category found in 2023 VS 2022 SMETA Audits</caption> <thead> <tr> <th>Category</th> <th>% NCs 2022</th> <th>% NCs 2023</th> </tr> </thead> <tbody> <tr> <td>No harsh or inhumane treatment is allowed</td> <td>~5</td> <td>~2</td> </tr> <tr> <td>Regular employment is provided</td> <td>~10</td> <td>~5</td> </tr> <tr> <td>No discrimination is practiced</td> <td>~2</td> <td>~1</td> </tr> <tr> <td>Working Hours are not excessive</td> <td>~18</td> <td>~15</td> </tr> <tr> <td>Living wages are paid</td> <td>~10</td> <td>~5</td> </tr> <tr> <td>Child labour shall not be used</td> <td>~2</td> <td>~1</td> </tr> <tr> <td>Working conditions are safe and hygienic</td> <td>~50</td> <td>~60</td> </tr> <tr> <td>Freedom of association and the right to collective bargaining</td> <td>~2</td> <td>~1</td> </tr> <tr> <td>Employment is freely chosen</td> <td>~2</td> <td>~1</td> </tr> </tbody> </table> </div> <p>We will be looking into common issues across species categories.</p>	Category	% NCs 2022	% NCs 2023	No harsh or inhumane treatment is allowed	~5	~2	Regular employment is provided	~10	~5	No discrimination is practiced	~2	~1	Working Hours are not excessive	~18	~15	Living wages are paid	~10	~5	Child labour shall not be used	~2	~1	Working conditions are safe and hygienic	~50	~60	Freedom of association and the right to collective bargaining	~2	~1	Employment is freely chosen	~2	~1	
Category	% NCs 2022	% NCs 2023																														
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Work with our suppliers to understand what modern slavery training they have using a detailed SAQ	We have asked all of our first-tier seafood suppliers about modern slavery training through a detailed SAQ. Our future ambition is to ensure our Turkish suppliers complete some modern slavery training.																															

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We will work with our suppliers to map the use of recruitment fees and identify hotspots, and develop action plans using a detailed SAQ	We have asked all of our first-tier seafood suppliers about how they recruit their workers. We need to map the hot spots and develop action plans	
We will continue to work closely with our Korean tuna suppliers and the wider industry to verify the improvements outlined by the Korean Government	We continued to focus our efforts in Korea in 2023 by working with suppliers, on the ground NGOs and wider industry and we visited Korea twice in 2023. Our future ambition is to lead a working group to efficiently update on our work in Korea, and to conduct interviews with migrant crew from vessels in our supply chain	
We will engage with recognised third-party certification standards	We actively engaged with the MSC via the SEA Alliance survey and we actively engaged with the ASC in two ways – firstly by showing our interest in joining a working group looking at how to advance the ethical agenda with Vietnamese farmed suppliers, and secondly by introducing one of our Vietnamese suppliers to ASC so they could pilot some work on Living Wage, particularly testing IDH’s salary matrix.	

We also said that we would report back on the following KPIs in our 2024 Modern Slavery Statement, reflecting on our activities from 1 Jan 2023 – 31 Dec 2023.

KPI	Result from 01/01/2023 – 31/12/2023
Number of policies reviewed and updated that explicitly link to modern slavery	1 (Social Responsibility Code of Practice)
Percentage of super temps that have completed Stronger Together training	N/A – in 2023, neither site had super temps
Number of people from both sites who have completed Responsible Recruitment Training	3 member of Chessington’s people team completed the training
Number of FNET working groups actively engaged in	2
Number of full GLAA audits conducted and number of non-conformances raised	Grimsby completed 2 Agency audits in 2023. 4 non-conformances raised, all of which have been closed out. Chessington completed 3 agency audits in 2023, all NCs and suggestions have been closed out
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 2023
% improvement made in the Stronger Together Progress Reporting Tool	22% improvement
% score achieved in the Employer Good Practice Implementation Checklist	67%

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% of seafood suppliers that have completed detailed SAQs through our supplier compliance management system	80% have completed
% of seafood suppliers that have answered the SAQ conducting training on Modern Day Slavery	40% of seafood suppliers are conducting training on Modern Day Slavery

In the next 12 months (Jan – Dec 2024) 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:

- No of Non-Conformances from SMETA audits at our Chessington and Grimsby sites
- % packaging and ingredients suppliers on Sedex
- No of wild salmon suppliers conducting SMETA audits in 2024
- No of people supported through Ingredients for Life Program
- No of SEA Alliance working groups engaged in
- No of Turkish suppliers who have attended training on modern slavery
- No of Norwegian whitefish vessels engaging with on social responsibility
- No of migrant crew from Korean vessels interviewed
- No of office staff who complete Stronger Together training in 2024
- % of first tier seafood suppliers who completed new Sedex SAQ by end of Jan 2024

Whilst we are proud of the many steps we have taken in 2023, we recognise that much difficult work lies ahead, especially as global geopolitical instability seems to be on the rise. 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, NGOs, and Governments around the world to effect positive change where it is needed and to ensure that we truly do enhance lives through fish.

Doug Adam, NESI Group Managing Director

24/06/2024

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