# Norebo Europe Limited

**Modern slavery statement for the financial year 2021**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Norebo Europe Limited ("**Norebo**") has taken to evaluate and understand potential slavery risks pertaining to the business of Norebo and their respective supply chain.

Norebo has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings.

**Our business**

Norebo Europe Ltd. is a UK trading company responsible for sales of frozen seafood products on a worldwide basis and is part of the Norebo Group founded in the Russian Federation.

**Our policies**

We recognise that the supply chain of food production is one of the sectors which may be vulnerable to modern slavery, particularly due to the global nature of suppliers. We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Code of Business Conduct. This code sets out the way we behave as an organisation and how we expect our employees and suppliers to act. Specific reference is made to the Norebo Code of Conduct for Sustainable Fishery and Corporate Social Responsibility.
2. Recruitment Policy. We operate a robust recruitment policy and conduct eligibility evaluations by ensuring applicants are entitled to work in the UK, and to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing Policy. This measure instils a culture whereby all employees know that they can raise concerns about how colleagues are being treated, or in connection with practices within our business or supply chain, without fear of reprisals.

**Suppliers**

Norebo operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that a particular organisation is reputable and has never been convicted of offenses relating to modern slavery. We also consider other factors, such as any geographical risk areas and the supplier's performance history.

**Training**

To ensure that our management and procurement teams are aware of the risks of modern slavery and human trafficking, training can be provided so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

**Responsibility**

We recognise the importance of maintaining constant vigilance to identify and address any impacts associated with slavery and human trafficking throughout our supply chains.

The Modern Slavery Act was introduced in 2015, and our approach and efforts in tackling the issue of modern slavery are constantly being reviewed and refined and are evolving over time.

**Statement approval**

This statement was approved by the Board of Directors on 09th June 2022.

Name: Sturlaugur Haraldsson

Signature: 