Joseph Robertson (Aberdeen) Limited – Modern Slavery Statement

MODERN SLAVERY includes the crimes of human trafficking, slavery and slavery like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children, and debt bondage.

Modern Slavery can occur in every industry or sector and is often linked to other crimes and activities that adversely affect human rights and cause environmental damage, as well as undercutting responsible businesses.

In 2015 an Act of Parliament was introduced along with an Anti-Slavery Commissioner to tackle the growing problem of modern slavery in the United Kingdom. The Global Slavery Index estimates there were 49.6 million men, women, and children victims of Modern Slavery in 2022 (up from 40.3 in 2016).

JOSEPH ROBERSTON COMMITMENT

Joseph Robertson (Aberdeen) Limited (JR) always treat people in our business and supply chains fairly and with respect.

JR commit to developing and adopting a risk based and proactive approach to tackle the serious issue of hidden labour exploitation which includes acting ethically and with integrity and transparency in all business dealings, and putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our complex and often remote supply chain.

We are committed to publishing this and future statements on the Modern Slavery Statement Register.

We have developed a series of KPIs linked to our significant ethical and social impacts and the United Nations Sustainable Development Goals (UNSDG) and will report on these annually.

OUR BUSINESS

JR are a family run value added seafood processor, based in Aberdeen who manufacture retailer 'own brand' seafood products.

We employ around 260 personnel covering 10 nationalities, including UK, Polish, Nigerian, Lithuanian, Ukrainian and Indian. All staff are hired on a permanent basis with no temporary, agency or seasonal staff.

SCOPE

All work is carried out in-house except laundry, waste management, vending machines supply and maintenance, transport of product, laboratory work and some engineering works. This statement covers internal, supply chain and outsourced activities.

As mentioned above JR has a wide reaching and complex supply chain making visibility more challenging with direct and in-direct sourcing from 29 countries worldwide, although the vast majority of product is purchased within the UK either direct or through agents.

Our main ingredient of seafood is both wild caught and farmed. Wild caught is mainly FAO Fishing Area 27 including North, Norwegian and Barents Sea and Iceland fishing grounds with some sourced from FAO 61 and 67 in the Pacific Ocean. Farmed sources are predominantly Scottish with one species sourced from Vietnam.

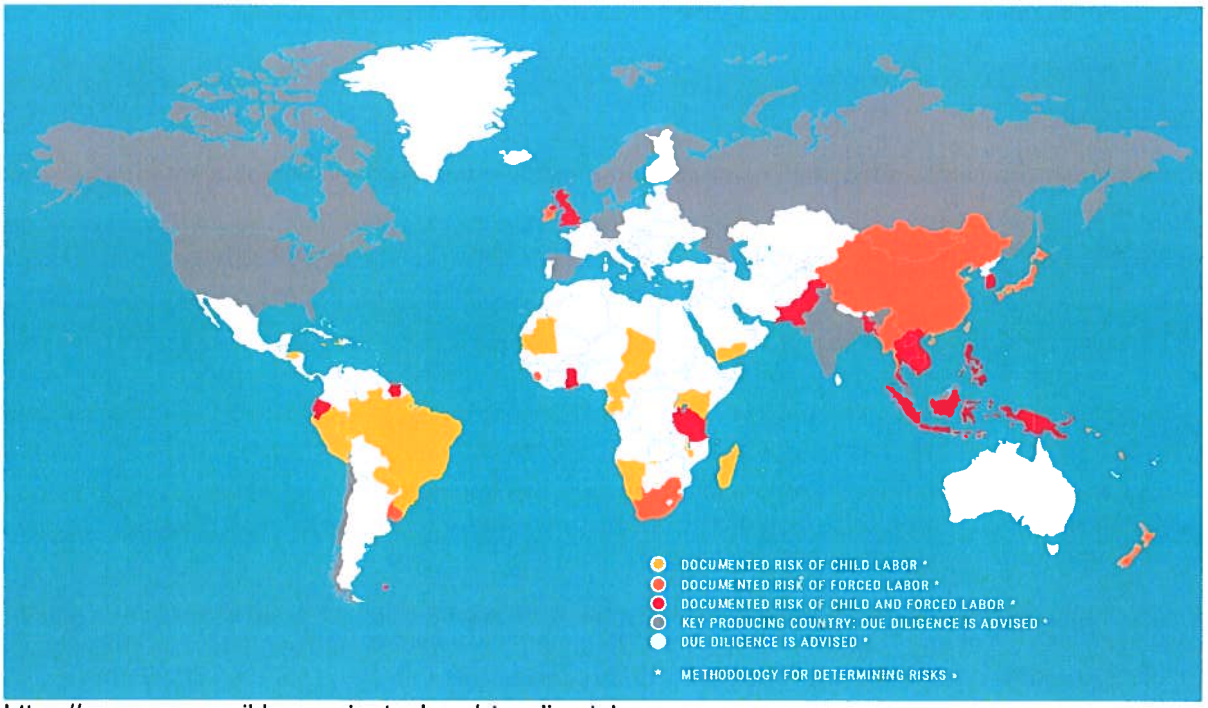
The map below shows where in the world we source our products from –

Joseph Robertson (Aberdeen) Limited – Modern Slavery Statement

Map 1 – Global Supply Chain



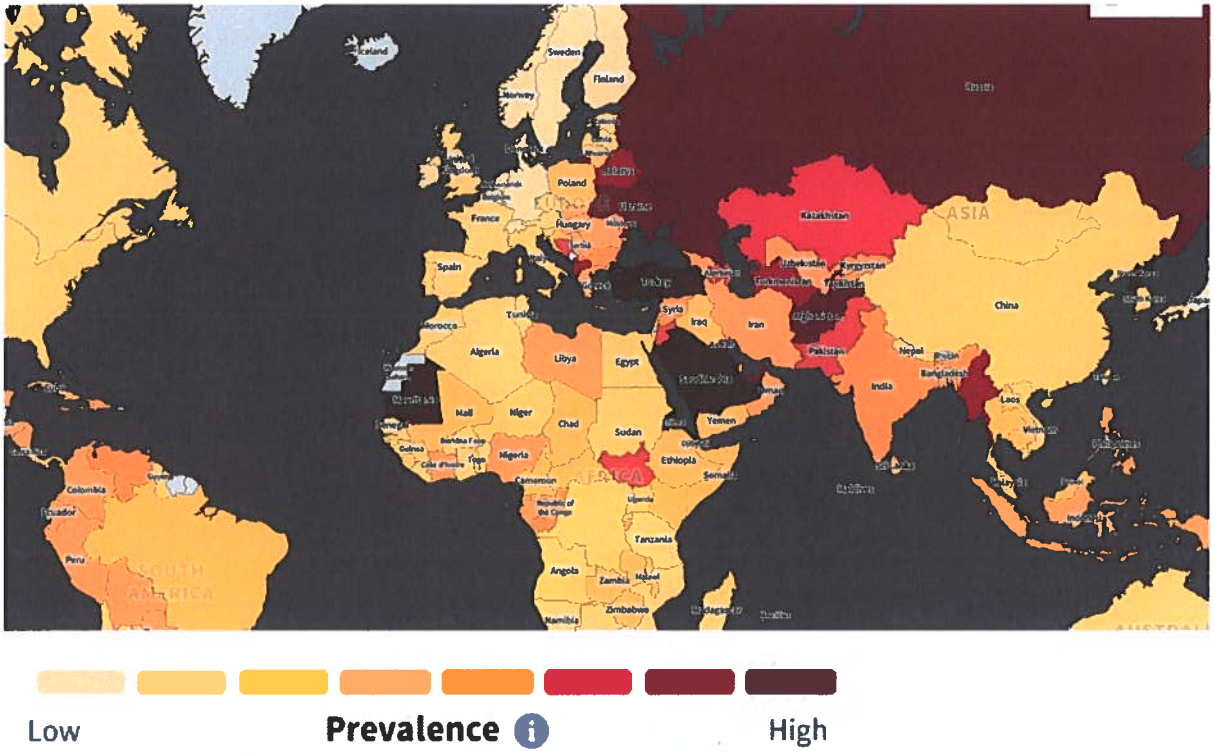
The map below shows which countries worldwide are at risk of child and forced labour. A key supplier country is China where there are documented risks of forced labour, and we amend our due diligence in this region to ensure adequate oversight.



https://www.responsiblesourcingtool.org/visualizerisk

The map below shows prevalence of Modern Slavery worldwide. In this assessment the majority of the countries we source from are rated Low with some Tier 2 supplier countries rated Medium

Joseph Robertson (Aberdeen) Limited – Modern Slavery Statement



https://www.walkfree.org/global-slavery-index/map/

GOVERNANCE

At JR the Directors are responsible persons for Modern Slavery within the organisation.

The HR Managers are responsible for day to day management of internal company requirements and the Head of CSR is responsible for supply chain requirements.

Four employees have been identified as Trusted Managers who are responsible for managing any potential Modern Slavery incident in the factory.

Joseph Robertson has publicly committed to the Ethical Trade Initiative Base Code and is audited against this standard, and has recently signed up to the UN Global Compact Ten Principles, principles detailed below.

Ethical Trade Initiative – Ethical Base Code

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United Nations – Global Compact Principles

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Joseph Robertson also gauge our progress using the Independent Anti-Slavery Commissioner Maturity Framework, and assess that we are at the Evolving Good Practice Stage. This framework will be used to assess JR's performance annually from 2024.

RISK ASSESSMENT

Risks can be found within business relationships, our business model, our operating context, public policy decisions leading to weak regulation and workforce characteristics.

People most at risk are those groups already discriminated against for example women, migrants, people with disabilities, young people, unskilled workers, illiterate workers or those who can't speak/read/write the local language and those with mental health issues.

We recognise that certain products and services in certain parts of the world carry a higher risk of child and forced labour and human trafficking and there are various international conventions and protocols that countries can sign up to, to show their commitment to the issue.

Out of the 26 countries (England/Scotland/Wales/Norther Ireland combined as the UK) we source from (directly and indirectly) –

- 100% or 26 countries (up from 55% or 15 countries in 2021) have signed the ILO Convention CO29 on Forced or Compulsory Labour (1930)
- 69% or 18 countries (up from 55% or 15 countries in 2021) have signed the ILO Protocol of 2014 to the Forced Labour Convention (1930)
- 92% or 24 countries (up from 89% or 24 countries in 2021) have signed the ILO Convention C105 on Abolition of Forced Labour Convention (1957)
- 57% or 15 countries (down from 67% or 18 countries in 2021) have signed the UN Slave Convention (1926)
- 100% of countries have signed the ILO Convention C182 on Worst Forms of Child Labour (1999)
- 100% have signed the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children (2000).
- 100% or 26 countries (up from 95.8% or 23 countries in 2021) have signed the Minimum Age Convention C138 (1973)

The following conventions are also key to addressing risk factors for forced labour:

- 81% or 21 countries (down from 83.3% or 20 countries in 2021) have signed C87 - Freedom of Association and Protection of the Right to Organise Convention (1948)
- 89% or 23 countries (down from 91.7% or 22 countries in 2021) have signed C98 - Right to Organise and Collective Bargaining Convention (1949)
- 100% or 26 countries (up from 95.8% or 23 countries in 2021) have signed C100 – Equal Remuneration Convention (1951)
- 96% or 25 countries (up from 91.7% or 22 countries in 2021) have signed C111 – Discrimination (Employment and Occupation) Convention, (1958)
- 61% or 15 countries (up from 54.2% or 13 countries in 2021) have signed C187 – Promotional Framework for Occupational Safety and Health Convention (2006)
- 42.3% or 11 countries (up from 41.7% or 10 countries in 2021) have signed C155 – Occupational Safety and Health Convention (1981)

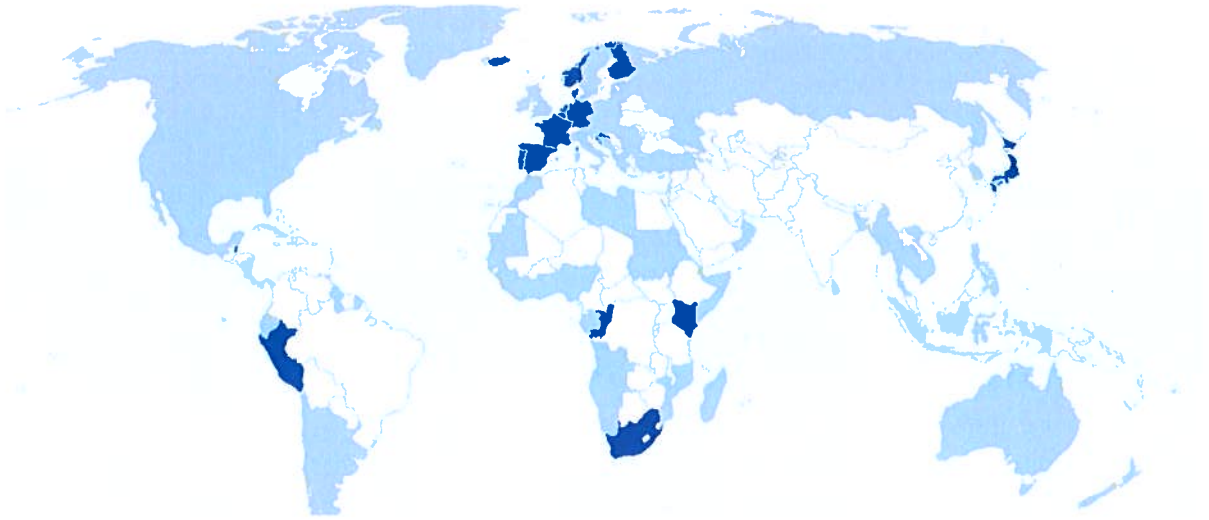
- 34.6% or 9 countries (up from 12.5% or 3 countries in 2021) have signed C190 – Violence and Harassment Convention (2019)

Pew Charitable Trusts have developed a series of maps to show which countries have ratified the three key seafood international agreements e.g. Port State Measures Act, Cape Town Agreement and C188 Working in Fishing Convention, see maps below

Port State Measures Map



Cape Town Agreement Map



C188 Working in Fishing Convention Map

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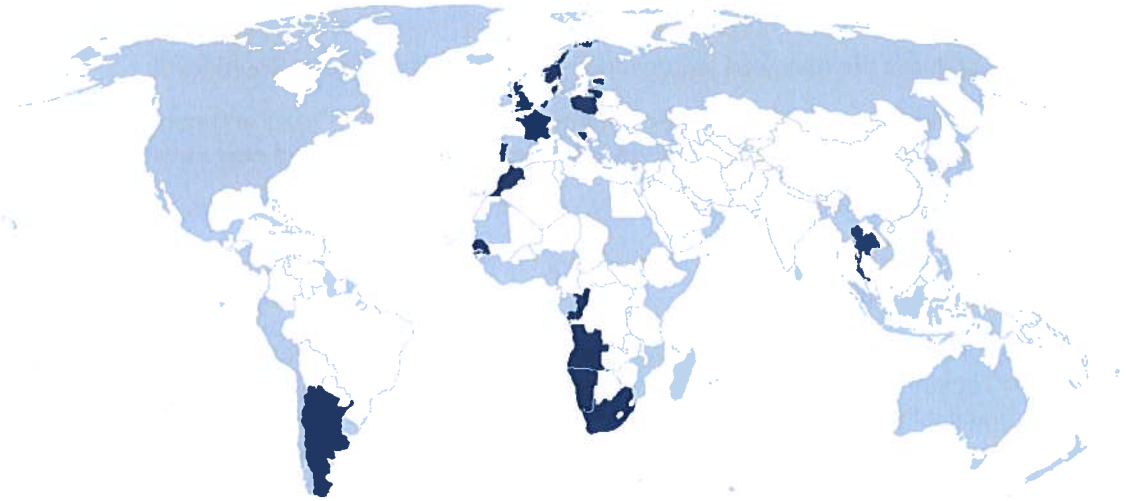

Regular unannounced ethical audits on processing plants in Asia, semi-announced audits on processing plants in Europe and announced audits on UK based processors are in place. In 2022 we reviewed and updated our Ethical Sourcing Policy clarifying and increasing expectations of suppliers further down our supply chain and identifying additional measures that will be developed into a supplier action plan.

Our Supplier Ethical Risk Assessment breaks down suppliers into categories of how much influence we have over them, from Low, Medium and High. The more leverage or influence we have the more chance we have to make positive changes. From our 50 Tier 1/Direct suppliers 29 are low leverage, 14 medium and only 7 high. In spending terms, we spend around 70% of our total spend on the 5 high leverage suppliers. Low leverage is due to us having less reliance on them and/or only purchasing small volumes.

In late 2020 we introduced a Modern Slavery commitment to our New Supplier Form, that all suppliers complete at time of contract, with regular updates requested to ensure details correct and to reaffirm their commitment. A majority of suppliers have now completed and returned this to the Purchasing Department. We also expect all our suppliers to complete the SEDEX Supplier Approval Questionnaire or if they are not members then our internal JR202 Ethical Supplier Questionnaire. The responses are reviewed against our ethical criteria, prior to the supplier being approved. Areas of concern are highlighted to the Procurement department or direct with supplier, and further information/clarification is requested. If the supplier does not meet our ethical trade standards, we can work with them to improve, but if improvement is not forthcoming, we may make the decision to stop sourcing from this supplier. Each supplier is reviewed on a case-by-case basis dependant on the product, source country and vulnerability of the product within JR.

SEDEX have developed a Vessel Questionnaire which can be completed by vessel skippers or owners, free of charge, without having to be a member. Our UK seafood suppliers have been made aware of this.

An identified risk in the supply chain is for Illegal, unreported and unregulated (IUU) fishing. To counteract that risk we ensure the majority our seafood is certified for sustainability which includes a review of labour rights and treatment of employees. The remainder is within a Fishery Improvement Programmes which focuses on improving sustainability of the source but also has a social element. We also request a list of vessels and their IMO numbers from our direct suppliers and have them confirm that vessels are checked against IUU blacklists regularly.

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POLICY IMPLMENTATION

All policies and procedures are reviewed, approved and signed off at Director/Board level

Policies are implemented by relevant staff being informed, staff asked to read and confirm that they have understood the document, and any changes to the policy are tracked and new versions reissued to staff.

INTERNAL POLICIES & PROCEDURES

- During our recruitment process, candidates are subject to specific questions, based on the Stronger Together checklist, that can give an indication if they have been trafficked and forced to work against their will.
- Eligibility to work in UK checks are also completed for every new employee.
- JR does not utilise temporary labour and only employs permanent staff, which reduces risk exponentially.
- Posters and leaflets on Modern Slavery have been distributed throughout the organisation.
- Modern Slavery is covered within inductions using a Stronger Together awareness video
- Whistleblowing procedures are in place for the company and our customers to report any concerns, new staff are made aware at induction and posters are displayed throughout the factory and office.
- JR is fully compliant with the ETI Base Code which is aimed at protecting human rights of workers in our supply chain.
- From 2021 we commit to be audited against the standard every 3 years via a SMETA audit and have committed to undergo the 4 pillar audit which includes additional elements on Environmental Management and Business Ethics.
- Compliant with all customer Ethical Trade and Human Rights Codes of Practice and review our processes in line with those and industry best practice.
- New starts are interviewed to identify the risk of recruitment or other fees being paid, with the exercise repeated 6 months later
- A Prevention, Identification & Remediation of Modern Slavery procedure has been developed including reference to the Modern Slavery helpline for management.
- If Modern Slavery is identified within our business we will remediate the situation, in line with the wishes of the victims, including access to training and compensation.
- We are committed to the Employer Pays Principle ensuring any fees paid by our workers or our supply chain workers are remediated by the relevant party.

SUPPLY CHAIN POLICIES & PROCEDURES

Our policy and procedure for ethical sourcing of raw materials is continually reviewed to ensure best practice and to extend requirements further into the supply chain. Currently it includes –

- All suppliers must commit to identifying and preventing modern slavery with a commitment in the New Supplier Form
- All suppliers are requested to join SEDEX and all suppliers are risk assessed against environmental, human rights and ethical trade practices
- Preferred Suppliers are expected to be members of SEDEX and also undergo a SMETA (SEDEX Members Ethical Trade Audit) at different timeframes dependant on risk.
- Detailed action plans for high-risk suppliers or those with limited evidence of ethical engagement

We support the following certification schemes - Marine Stewardship Council (MSC) for wild caught seafood, Global Gap (G-Gap), Best Aquaculture Practices (BAP) & Aquaculture Stewardship Council (ASC) for farmed sources certification schemes which include assessment of ethical treatment of workers.

We also support the Seafish Responsible Fishing Vessel Scheme (RFVS) as a means to have ethical oversight at vessel level, and we are working with suppliers on gaining this or other alternative ethical standard certifications such as RISE or in-country schemes such as in Norway and Iceland.

Procurement practices can add to the risk of Modern Slavery. We ensure good working relationships with suppliers and negotiate price along with other factors including health and safety, human rights and ethics. This ensures we do not put undue pressure on suppliers and ensure prices paid are sufficient for decent wages to be paid and safe working conditions found in the work place. The Procurement Department were invited to a Modern Slavery workshop in Q1 2020 to explain the issues faced by suppliers due to procurement practices and identify any negative purchasing practices within JR with the aim of reducing the risk of modern slavery from purchasing decisions. The Purchasing team will undergo a refresh of the issues with the aim of developing an action plan for improvement.

The JR Sales team also received basic awareness training in 2021 on what Modern Slavery is, how we are managing it within JR and our plans for managing it within the supply chain.

If Modern Slavery is identified within our supply chain, we will work with suppliers to remediate the situation, working in line with the wishes of the victims, including access to training and compensation..

CAPACITY BUILDING IN THE SUPPLY CHAIN

We recognise the challenge of ensuring full visibility within the supply chain and are aware of the reluctance of some suppliers further down the supply chain to undertake additional due diligence at the request of a customer many steps removed. We will continue to work with our direct suppliers on an approach to these challenges.

The Risk Assessment process has also identified areas where we have little or no leverage with the supply chain e.g. vessels due to their remote working and being 3-4 steps down our supply chain, and our indirect Tier 2 and 3 suppliers. Currently we have access to the names and locations of these suppliers but we have no direct contact with them so capacity building will likely involve only our Tier 1 suppliers, with an expectation on them to cascade capacity through their own supply chain.

In 2020 JR assessed all suppliers against the risks of recruitment fees and developed specific supplier questionnaires to question what due diligence is in place to prevent fees being paid by their employees and in their supply chain. The response from suppliers was mixed, with some confirming they don't use labour providers or agency staff which reduces their risk dramatically, others responded fully with what due diligence they had in place.

The next steps on Recruitment Fees are to work directly with key strategic suppliers (a mix of seafood and other raw materials suppliers) and develop a workshop to highlight the issue and then carry out a deep dive into their recruitment policies, procedures to identify risks of recruitment fees and then carry out worker interviews to identify if recruitment fees have been paid, and if discovered, we will work with suppliers to remediate the situation. This has been delayed due to low response from suppliers and other commitments. Identifying and removing Recruitment Fees will be a key focus in 2024.

OUTSOURCED SERVICES POLICIES & PROCEDURES

Outsourcing is a way for specialist activities to be managed by a 3rd party on our behalf. Our current procedure for outsourced services is for all contractors to complete the New Supplier form including a

commitment to prevent, identify and remediate any modern slavery within their business and supply chain and to provide their Modern Slavery statement and any ethical sourcing/purchasing procedures/policies. All 3rd party contractors were asked to sign the New Supplier Form in 2021, responses detailed below in KPIs. Examples of our outsourced services are -

Laundry – provides factory coat cleaning and sanitary services

Transport – provides all our logistics for product from factory to depot

Engineering – ad hoc engineering projects

Waste Management – 4 contractors covering recyclables, food, fish and confidential

Laboratories – used for sample testing

Caterers – provide vending and water machines

We plan to embed these outsourced services into our standard ethical approval process, and we will work closely with FNET through the Raw Materials and Services Working Group for best practice on this.

INDUCTION & TRAINING

All JR staff and supply chain partners need to be engaged to help us tackle Modern Slavery and be able to recognise the signs and what to do if they see anything that concerns them.

This engagement begins on an employees' first day with Modern Slavery being covered at inductions with a short presentation and the Stronger2gether video. All new employees receive training on the Ethical Trading Initiative and its base code as well as the whistleblowing procedures for our company and customers.

The Head of CSR has received training from Stronger Together on identifying modern slavery in UK businesses and global supply chains.

Four trusted Managers received training in 2022 from Stronger Together on identifying Modern Slavery in UK businesses and further internal training on how to manage a potential Modern Slavery situation in the factory ensuring workers are protected from further victimisation, punishment or retaliation.

JR is also committed in 2024 to training additional key staff in conjunction with Stronger Together which demonstrates what we can do to monitor, detect, protect and aid any colleague who may be at risk of, or already linked to modern slavery or forced labour, focusing on team leader level.

COLLABORATION & PARTNERSHIP

At JR we collaborate and partner with various organisations on this issue –

Food Network for Ethical Trade (FNET) is a collaborative initiative aiming to use the collective leverage of suppliers and retailers to bring about positive change in working conditions in global food, beverage and horticulture supply chains by providing guidance, resources, training and opportunities for collaboration. JR are involved in various workstreams, Head of CSR regularly attends FNET all member meetings and working group sessions and co-leads the Raw Materials and Service working group.

Seafish Ethical Common Language Group (ECLG) is a collective response to growing concerns regarding unethical practices within the global seafood market. The aim of the group is to

establish a common understanding of ethical issues within the seafood industry, communicate measures taken to address them, and agree a clear agenda for future action. Head of CSR regularly attends ECLG meetings.

The Seafood Ethics Action Alliance (SEAA) has been established by the seafood industry to provide a platform for collective engagement, to share information on emerging issues, agree best practice solutions, and provide a forum for collective pre-competitive action where it is not better fulfilled by an existing organisation. The SEA Alliance co-ordinates pre-competitive ethics work for the UK seafood industry and addresses key ethical issues in shared supply chains. Head of CSR regularly attends SEAA meeting and is also on the SEAA Steering Committee.

We support the *Responsible Fishing Vessel Scheme* (RFVS) which has been developed to raise standards in the catching sector, enabling those within the seafood supply chain to demonstrate their commitment to the responsible sourcing of seafood. The RFVS is the only global standard that audits compliance on board fishing vessels, including ethical and welfare criteria.

Customer specific Ethical Trade Forums are held annually and give JR an detailed insight into the aims and objectives of retailers as well as insight into what other industry members are doing to meet and exceed customer ethical trade policies

Stronger Together is a multi-stakeholder organisation aimed at reducing Modern Slavery in particular forced labour, labour trafficking and other hidden third-party exploitation of workers. They provide guidance and training to employers, workers and labour agencies. JR uses the tools and resources available to help develop this statement. JR became business partners to Stronger2gether in 2020.

JR follow the *ETI* base code internally and expect our Preferred Suppliers to do the same. The code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of good labour practice.

JR use products certified by a range of certification bodies, specifically, Aquaculture Stewardship Council (ASC), Global Gap (G-Gap), Best Aquacultural Practice (BAP), Roundtable for Sustainable Palm Oil (RSPO), Responsible Fishing Vessel Scheme (RFVS) and Marine Stewardship Council (MSC), all have introduced social/labour elements in their certification scheme.

MONITORING & KPIs

We have linked our KPIs to the UN Sustainable Development Goals –

8.7 Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms

16.2 end abuse, exploitation, trafficking and all forms of violence and torture against children

KPIs can be quantitative, qualitative, leading, lagging or process and can focus on input, output, outcome or impact, but all must be SMART. Our KPIs aims and results since 2019 –

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The table below shows the KPIs set in 2019 and their results through to 2023	**2019 (Result)**	2020 (Aim)	**2020 (Result)**	2021 (Aim)	**2021 (Result)**	2022 (Aim)	**2022 (Result)**	**2023 (Aim)**	**2023 (Result)**	2024 (Aim)
Personnel Trained in Modern Slavery S2G	1	10	1	10	6	4	4	4	0	4
Whistleblowing Calls made	0	use if required	1	use if required	0	2	0	2	0	2
Tier 1 Suppliers/ contractors Signed MS Commitment	0	n/a	1	c30	32	c30	37	49	52	55
Supplier SMETA NCs 'employment is freely chosen'	3	0	2 (from 1 supplier)	0	6 (from 3 suppliers)	0	1	0	2 (from 2 suppliers)	0
Internal SMETA NCs 'employment is freely chosen'	0	0	0 (no audits)	0	0 (no audits)	0	0	0	0	0
JR Progress Reporting Tool (PRT) Sections with Full marks	n/a	n/a	n/a	n/a	22	25	28	29	29	30
JR PRT Score percentage	n/a	n/a	49	52	54	58	60	63	65	67

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Date.....2/2/24.....

Michael Robertson – Managing Director

The Stronger Together Reporting Tool is also used to gauge progress and carried out annually by the Head of CSR. This gives us a benchmark against competitors and highlights improvement opportunities. In 2018 we scored full marks in 8 questions (10%), scored above average in 24 questions (30%) and below average or unanswered/N/A in 47 questions (60%).

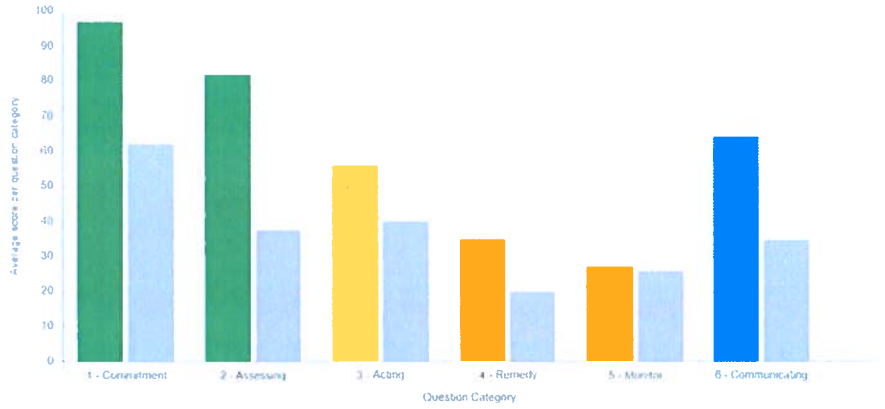
The tool was updated November 2020 with an overall score of 49%. We scored high for Commitment showing Good Progress. Assessing, Acting and Communicating categories are marked as 'getting there' and only Monitor and Remedy are areas where more work is needed. We scored full marks in 20 questions or 28% (up from 8 /10% in 2018).

The tool was updated again in November 2021 with an overall score of 54% (up from 49% in 2020).

The tool was updated again in December 2022 with an overall score of 60% (up from 54% in 2021).

The tool was updated again in January 2024 with an overall score of 63% (up from 60% in 2022). From 66 answered questions we are above the industry benchmark in all but 5 response (92.4%)

Graph 1 – Progress Reporting Tool Comparison with others in programme



Legend: green = achieving: blue = good progress: yellow = getting there: orange = more work needed

It is clear that we are achieving above average scores in all sections but scoring more than double than average on Assessing and Remedy, with positive scores on all other sections.

STATEMENT APPROVAL

The Company Directors and senior management shall take responsibility for implementing this policy statement and its objectives, and will ensure adequate resources and investment to safeguard the statement.

This statement was approved by the Board of Directors

Signed.....