MODERN SLAVERY ACT 2015: SLAVERY AND HUMAN TRAFFICKING STATEMENT 2022

John West Foods Ltd (**John West**) is committed to continually improving practices to combat slavery and human trafficking. This statement describes the activities undertaken by John West as a subsidiary of Thai Union Group PCL (**Thai Union**) to prevent, detect and remedy violations of human rights, particularly modern slavery and forced labour within its operations and supply chains. For reference the Modern Slavery Act Statement for Thai Union Group can be accessed here:

https://www.thaiunion.com/files/download/sustainability/20220408-tu-uk-modern-slavery-act-statement-2022.pdf

Group structure

John West is an importer and distributor of canned seafood in the fast-moving consumer goods industry and part of Thai Union. Thai Union has its head office in Samutsakorn, Thailand. Thai Union is regarded as one of the world's leading seafood producers and is one of the largest producers of shelf stable tuna products with annual sales exceeding THB155 billion (US$4.45 Billion) (and a global workforce of over 44,000 people who are dedicated to pioneering sustainable, innovative seafood products.

As a subsidiary of Thai Union, John West applies and observes Thai Union policy and practice in relation to the UK Modern Slavery Act 2015.

The John West business

Headquartered in Liverpool, England, and with offices in Dublin and Utrecht, John West employs around 90 people and has an annual turnover of £130 million.

Our supply chains

John West sources from 5 main species or groups of species of seafood: tuna, salmon, sardine, mackerel and cephalopods. Thai Union is a primary processor. Neither Thai Union nor John West own any fishing vessels. Seafood raw materials are therefore sourced from suppliers from oceans and aquaculture operations around the world. In addition to seafood aw materials, we also source a variety of food ingredients, packaging materials and logistics services from suppliers based in our countries of operation.

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A Thai Union Group company
No. 1 Mann Island, Liverpool L3 1BP
United Kingdom

T : +44 (0) 151 243 6200
F : +44 (0) 151 236 7502

www.john-west.co.uk

Registration no. 00200767

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Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Business Ethics and Labour Code of Conduct reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to prevent slavery and human trafficking from taking place in our supply chains.

Due diligence processes for slavery and human trafficking

The *Thai Union Human Rights Due Diligence Framework* details our statement and policies on human rights. All of our policies on human rights, including modern slavery and human trafficking, and broader sustainability areas are guided by *SeaChange®*, the Thai Union sustainability strategy designed to deliver real and lasting changes in the way we operate in the wider Thai and global fishing industries. This is an integrated plan of initiatives organised into 4 programmes, one of which is "Safe and Legal Labour" which states providing safe, legal and freely chosen employment in our own facilities and supply chains is critically important to Thai Union. Our strategy therefore aims to eliminate a wide range of unethical labour practices, as well as modern slavery and human trafficking.

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The 2025 milestones under the "Safe and Legal Labor" pillar are as follows:

- We will treat all workers, whether migrant or local employees, fairly and with dignity. They will have safe and freely chosen employments supported by ethical recruitment practices.
- Our land based operations and supply chain will comply with our Business Ethics and Labour Code of Conduct, and at sea with our Vessel Code of Conduct and Vessel Improvement Program.
- Through education and open dialogue, we will empower our workers, giving them a voice today and in the future.
- We are committed to leading an ongoing and active dialogue with industry, government and civil society to ensure lasting improvements in labour practices across the entire industry and beyond.

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Supplier adherence to our values

Identification of risks relating to human rights, including modern slavery and forced labour, in our operations and supply chains is a critical pillar of Thai Union's overall Human Rights Due Diligence Framework (Thai Union Human Rights Due Diligence Framework). To ensure that our suppliers and contractors comply with this framework we have in place a supply chain compliance programme across the Thai Union group. Suppliers are asked to sign an acknowledgment of the Thai Union Business Ethics and Labour Code of Conduct (COC). In doing this they are committing to comply with the mandatory requirements for conducting business with us which include:

1. Business being conducted lawfully and with integrity
2. Work conducted on the basis of freely agreed and documented terms of employment with legal compliance
3. All workers are treated equally and with respect and dignity
4. Work is conducted on a voluntary basis with no forced or compulsory labour
5. All workers are of an appropriate age
6. All workers are paid fair wages
7. Working hours for all workers are reasonable
8. All workers are free to exercise their right to form and/or join trade unions and bargain collectively where permitted by law
9. Workers health and safety are protected at work
10. Workers have access to fair procedures
11. Business is conducted in a manner that embraces sustainability and reduces environmental impact.
12. Progress and compliance are monitored

Suppliers who fail to adhere to the Code of Conduct and engage in unfair and illegal labour practices will be asked to provide a time-bound remedial plan or may have their contracts suspended or terminated.

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Policies on Modern Slavery, Human Trafficking and Human Rights

Thai Union issued the following policies to support the achievement of milestones on human rights under our SeaChange® Strategy:

Human Rights Policy

Launched in 2018 and subsequently updated in 2021, the Human Rights Policy states the commitment to use our commercial leverage and leadership role to address human rights issues not just in our value chain but also in the wider global seafood industry. In line with the Business Ethics and Labour Code of Conduct (COC), the Human Rights Policy re-iterated our commitment to respect universal human rights, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. The recent update in 2021 explicitly states our commitment to respect the rights of people in the vulnerable groups, customary resource users, and indigenous people.

Business Ethics and Labour Code of Conduct (CoC)

Launched in 2015 the Business Ethics and Labour Code of Conduct (COC) embodies our commitment to conduct business with integrity, openness and respect for universal human rights and core labour principles throughout our operations. This code is applicable to all John West and Thai Union employees, suppliers and sub-suppliers employed by primary suppliers in business with Thai Union.

In particular the Code states:

- "All laws and regulations are complied with in the countries in which the supplier operates."
- "Forced labour, whether in the form of indentured labour, bonded labour or other forms, is not acceptable. Mental and physical coercion, slavery and human trafficking are prohibited."

In 2018 Thai Union published a separate Supplier Business Ethics and Labour Code of Conduct. The Suppliers CoC shares the same common principles with the previously issued CoC, but focusses in more detail on supplier requirements, particularly with respect to ethical recruitment.

The John West Employee Code of Conduct refers explicitly to the CoC, and all employees are made aware of this both during induction and periodically throughout their employment when the handbook is updated. This document also explicitly states the policy and procedure applicable to Whistleblowing.

Both John West and Thai Union reserve the right to take legal action and report illegal activity to the relevant authorities and trade associations.

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Global Whistleblowing and Investigation Policy

Launched in 2019, the Global Whistle-blower and Investigation Policy was issued to provide specific guidance on the whistleblowing system and for investigating fairly any violation or potential violation of the Thai Union Employees Code of Conduct, Group or local Policies or any applicable Laws or Regulations.

In support of this the Whistleblowing platform "Speak Out" was launched in 2019; this is a platform for all staff and workers to ensure strict compliance with ethical and legal standards within the workplace. It is available online and through toll-free numbers and is available for workers worldwide to report any concerns related to violations outlined in company policies, the Code of Conduct, or any fraud, abuse, or other misconduct in the workplace. This policy is designed to encourage and enable the workforce (including employees, directors, contractors and temporary workers) to voice their concerns, seek advice, file a complaint or grievance, participate in investigations, proceedings or hearings without fear of retaliation. This also promotes a positive workplace culture and prevents unfair and unlawful retaliation against employees.

Training

To ensure a high level of understanding and awareness of the risks of modern slavery and human trafficking in our supply chains and our business, mandatory on-line training on Modern Slavery Awareness is provided to all of our employees. All new joiners to the business are asked to complete this within their first month of joining the business, and this is also covered in our induction process. The course has the following learning outcomes:

- To understand and work towards compliance with the Modern Slavery Act 2015
- Understand what slavery is and the various forms that modern slavery can take
- Learn what organisations and individuals can do to help get rid of slavery in the UK

In 2018, the SeaChange Sustainability Academy was started which delivers training to individuals within the business. This aims to enable attendees to be able to discuss the Thai Union sustainability strategy and have the right level of understanding to incorporate it within their different roles. To date, the European Thai Union subsidiaries including John West Foods have received over 45 hours of training sessions with over 300 employees attending. This session includes explaining about the Safe and Legal Labour program in the strategy.

In 2022, employees from John West sales, procurement, finance, marketing, supply chain, and human resources have completed the Anti-Bribery and Corruption e-learning. With this e-learning we want to help employees get a deeper understanding of bribery and corruption laws and practices, as well as highlight the importance of complying with our Thai Union codes of ethics and good conduct.

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Recruitment

Our recruitment practices (including our work with our Third Party Recruitment Outsource Provider) ensure that as a business we undertake pre-employment checks on all of our employees prior to them joining us to confirm their identify and right to work. This aims to remove the potential of modern slavery and human trafficking as third- party recruitment agencies working with John West can only be part of our preferred supplier list (PSL) if they sign and agree to our Recruitment Terms of Business which clearly state that all candidates put forward by them have proof of identity and a right to work in the UK. Our John West Equality, Diversity and Inclusion policy further reinforces the prohibition of discrimination in any aspect of employment.

Our effectiveness in combating slavery and human trafficking

A number of measures have been implemented to identify and remedy any infringements of human rights (including modern slavery and human trafficking) from within our operations and supply chains. These measures comprise internal and external audits as well as provision of grievance channels**.**

1) **Audits of Thai Unions own facilities**
   Thai Union factories and factories within the Thai Union and John West supply chain worldwide are subject to internal audits as well as world recognised external verifications and audits by third-party certification bodies working to promote standard labour practices. These include the Ethical Trade Initiative (ETI) Base Code; Amorfi BSCI; SMETA; and Verite social capacity standards as well as a number of retailer specific programmes to audit and verify safe and legal labour conditions.

   Supplier Approval Process and Supplier Audits

   Thai Union also maintains rigorous procedures to screen and approve potential suppliers before we source from them. Compliance with the Thai Union Business Ethics and Labour Code of Conduct is required for all suppliers. New suppliers must acknowledge and accept the CoC and existing suppliers are required to review and sign the CoC. The Thai Union Fishing Vessel Improvement Programme and Code of Conduct (VCoC) applies to fishing vessels that supply Thai Union (i.e. those that are the John West supply chain). Since 2018 Thai Union has been working with third party auditors which have conducted audits on tuna vessels around the world and Thailand vessels. For those suppliers that do not fully meet every clause in the VCoc, the ask is that they work on a time-bound remedial plan to address the findings of the audit through

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the implementation of a 'Vessel Improvement Project' (VIP). Where any findings are found to be of a critical nature then business may be suspended immediately.

2) John West Whistleblowing mechanism

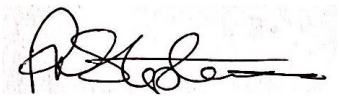
In accordance with the Public Interest Disclosure Act 1998, John West has instituted a system for reporting information which is reasonably believed to indicate a wrongdoing within the workplace. This process is documented in the John West Employee Handbook and is periodically shared with employees. No concerns about slavery and human trafficking within the John West supply chain have been reported through this channel during the previous twelve months.

Through regular communications we ensure that our employees are aware of The Global Whistleblowing and Investigation Policy the Speak Out Hotline referenced earlier.

We have also launched Anti Trust and Competition law training to all employees in support of this.

Declaration

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending March 2022. It was approved by the board in June 2023.



PAUL STEPHENSON,

MANAGING DIRECTOR, JOHN WEST FOODS LTD

Date: June 19, 2023

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