MODERN SLAVERY STATEMENT
2025 REVIEW





OUR BUSINESS & SUPPLY CHAINS

Whitby Seafoods is publishing this statement under the provision of the UK Modern Slavery Act 2015.

We manufacture and supply frozen and chilled seafood products to retail and food service businesses in the United Kingdom.



Wild Nephrops sourced from **374** vessels and Farmed prawns sourced from **48** farms.



5 packaging, **22** ingredient suppliers and **3** third party suppliers.



2 factories located in Whitby and Kilkeel.



152 customers from supermarkets to food service providers.



5.2m households enjoy our products and **31.4**m servings enjoyed outside of the home.

80% of the seafood we source comes from the British Isles in the form of Scampi, commonly known as Langoustine, Dublin Prawns and Norway Lobster. A small proportion of our processing is carried out by a partner in Vietnam, which is certified and SEDEX audited.

Other raw materials are sourced in smaller quantities from suppliers in China, Vietnam, Malaysia, USA, Peru, Spain and Iceland.

This statement refers to the financial year ended 21st December 2024.

£67 MILLION TURNOVER

370 PEOPLE DIRECTLY EMPLOYED

2 SITES



SUSTAINABILITY VALUES



SUSTAINABILITY

We care for the seas and oceans from which we source and support the people and communities who rely upon them.

Our mission is to challenge the status quo, improve value, quality and ethical standards in seafood.

Currently our focus is on:

- **Sourcing responsibly.**
- **Promoting and supporting ethical behaviour in our supply chain.**
- **Working legally and safely.**
- **Operating with minimal environmental impact.**

We have approximately 120 international direct suppliers across all our raw material and other operational procurement. We recognise that many of our suppliers utilise third parties for materials and labour. We continue to promote our policy within our supply chain.

Modern Slavery is an umbrella term used to describe
"when an individual is exploited by others, for personal or commercial gain..."
– Anti-Slavery International

Our commitment to Human Rights is outlined in our policies, which are available upon request and adhered to through our membership of:

Sedex – www.sedexglobal.com

Stronger Together – www.stronger2gether.org

Seafood Ethics Action Alliance (SEA Alliance) – www.seaa.org



ORGANISATIONAL POLICIES



This company has the following policies in place to offer guidance to stakeholders and to mitigate the risk of modern slavery:

- Forced, Bonded and Involuntary Labour.
- Freedom of Association.
- Young Workers.
- Recruitment Policy.
- Grievance Policy.
- Anti-Bribery Policy.
- Whistleblowing Policy.
- Equal Opportunities Policy.
- Employer Pays Principle Policy.
- Remediation Procedure.

We take human rights allegations seriously and have a whistleblower policy at Whitby and Kilkeel Seafoods, to allow our teams to voice any concerns. We have also incorporated customer whistleblowing requirements at our sites where applicable.

We believe that fair and ethical treatment of employees and workers is fundamental to our success.

As such the company is committed to following the principles of the Ethical Trade Initiative (ETI) base code and communicating this to our team members. We continue to engage with our land-based suppliers in demonstrating that they have applied the ETI base code within their operations.



RISK ASSESSMENT

Whitby Seafoods undertakes risk assessment methodology to identify where priorities for further consideration should be taken.

This assessment considers the jurisdiction country for the fishing operations, catch area, and where fish preparation takes place. We reference the SEA Alliance Fishery Risk Tool and the US Trafficking in Persons Report 2022. We have prioritised ethically sourcing seafood in our risk assessment due to the reported issues in this sector.

Risk mitigation includes:

- **Direct feedback from the supplier (e.g. Sedex self-assessment).**
- **Involvement in multi-stakeholder efforts, such as the SEA Alliance.**
- **Working towards, or achieving credible certification. (e.g. ASC, Fairtrade, SMETA).**
- **Ability to demonstrate compliance with international law.**



The main challenges in the seafood supply chain are monitoring boats and ensuring good working standards while at sea. We support the UK's ratification of ILOc188, a significant move aimed at reducing the ethical risk within a large proportion of our supply chain.

We actively participate in multi-stakeholder initiatives, including the Sustainable Seafood Coalition, Social Ethical Action Alliance, MSC Improvement Program Social Responsibility Working Group, and the Shellfish Association of Great Britain. By working together, we aim to act more decisively and transparently as an industry.

MSC IMPROVEMENT PROGRAM

The social performance of the UK Nephrops fishery continues to be tracked. The Project UK Fisheries Improvement Program finished in 2024 and is now in the process of applying to enter the MSC Improvement Program. A social risk assessment of the UK Nephrops fleet will be carried out, informing the action plan driven by the social responsibility working group in 2025.

RISK ASSESSMENT

SEA ALLIANCE

We are members of the Seafood Ethical Action (SEA) Alliance. The seafood industry established a platform for collective engagement, sharing information on emerging issues, providing guidance on incident protocols surrounding human rights, agreeing on best practice solutions, and offering a forum for collective pre-competitive action.



SEDEX

The company uses the Sedex self-assessment tool to manage ethical trading within its land-based supply chain. We use the information provided to identify high-risk suppliers and take appropriate action to improve labour standards. This allows us to take remedial action if required with the supplier, including the option of ceasing supply, if actions to strengthen ethical standards are not progressed.

We have developed an internal remediation tool and will collaborate with partners such as NGO's (non-government organisations), charities and law enforcement in creating effective protective measures should victims of modern slavery be identified.

The most common accreditations for Whitby Seafoods' business model that include ethical approaches to labour outside UK fishing are:

- A Sedex audit undertaken by an independent 3rd party.
- Aquaculture Stewardship Council (ASC) accreditation.
- An audit conducted by Whitby Seafoods.
- An independent human rights audit conducted by a competent 3rd party.



RISK ASSESSMENT

ASC ACCREDITATION

Pangasius and King Prawn supply chains are sourced from ASC - accredited sources. ASC applies a third-party certification system, ensuring the program is credible, robust, and meets best practice guidelines set by ISEAL and FAO (Food and Agricultural Organisation for the United Nations).

Within this, there are clauses that drive minimum standards in the areas of:

- **Forced and compulsory labour.**
- **Health and safety.**
- **Discrimination.**
- **Fair and decent wages.**
- **Child labour and young workers.**
- **Freedom of association and collective bargaining.**
- **Working hours.**
- **Labour contracts.**

AUDITS

Audits and inspections play an essential part in the due diligence system of supplier management.

Standards are used to compile evidence of compliance and identify any actions required to address shortfalls against these. They are then prioritised into short, medium, and long-term action plans to show demonstrable development and continual improvement.

Audits are written to a high internal standard and incorporate any customer requirements. They are an in-depth look at company policies and procedures and their application.

Assessments are a point-in-time visual inspection. Whitby Seafoods staff use them as part of wider supplier visits and look for physical signs of violations, as indicated by the internal training.

Kilkeel Seafoods has continued auditing its Nephrops suppliers to ensure food safety, product quality and worker welfare. All suppliers must also complete a supplier approval questionnaire that is reviewed annually and report any changes within their business.

Audits of labour providers are conducted by the Whitby HR team against internal standards without any significant non-conformances.



TRAINING AND AWARENESS



TRAINING

One of our main focuses is raising awareness and providing adequate training to our employees. We conduct modern-day slavery training as a standard part of our induction, and enhanced training is given to members of the sustainability and ethics team through Stronger Together.

KPIs

Once the Social Risk Assessments or equivalent frameworks are in place (2025), it may be possible to report more relevant KPIs for the highest-risk part of our supply chain—the Nephrops catching sector.

Whitby Seafood uses the indicators below to identify areas of risk in the business and within our supply chain:

KPI	2024
Number of modern Slavery cases reported at our sites	0%
% of staff that have completed onboarding Modern Slavery training	100
Number of whistleblower reports concerning exploitation at our sites	0
% of Red Sedex suppliers	14
% Amber Sedex suppliers	59
% Green Sedex suppliers	25
% of audits on Sedex linked sites	34
Number of Modern slavery reports raised industry, media, SEA Alliance, HRASi and ITF.	1



MOVING FORWARD



We will continue to concentrate on the UK and Irish Nephrops Fleet, especially those with migrant crew. Concurrently supporting the action plan and its completion from our place within the MSC Improvement Program and Steering Groups, along with the crew welfare work being carried out by HRASi on behalf of the Anglo Northern Ireland Fish Producers Organisation (ANIFPO) and Northern Ireland Fish Producers (NIFPO). HRASI initiated work in 2024 with an internal review of NIFPO and ANIFPO's governance processes. This year, they will conduct a detailed gap analysis, interviewing 100% of the migrant crew aboard member vessels.

We have trialled a new Nephrops de-header and stunner machine on the MFV Golden Ray, which will improve crew rest hours and animal welfare practices.



We will continue enhancing our internal policies where we see gaps against best practices and stakeholder feedback to put in place support mechanisms to encourage potential victims to engage. We will arrange for an independent 3rd part ethical audit at our Whitby Site as committed to our stakeholders.

Our UK Nephrops supply base remains a priority for us.and our Sustainability Director will continue to forge partnerships within the industry to help improve transparency of ethical standards on board vessels within our supply base.

This statement has been approved by the board of directors of Whitby Seafoods Ltd. and will be updated and reviewed annually.

Daniel Whittle

Managing Director, Whitby Seafoods Ltd. May 2025



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