



Young's Seafood Modern Slavery Statement 2020/21

Our commitment to tackling modern slavery

Our mission is to inspire people to love fish now and for generations to come. To achieve this, we believe in doing right by our planet, our partners and our people, whether they work as part of our internal team or are part of our supply chain.

We operate a policy of zero tolerance towards Modern Slavery. Not only because it is our legal obligation to do so, but because it is the right thing to do.

This is a responsibility that everyone here takes very seriously and we support this by our pro-active approach to risk analysis, buying policy, worker training and the provision of appropriate management policies and reporting channels throughout our business.

On behalf of our Board of Directors, I formally approve the Young's Seafood Modern Slavery Statement.

Simon Smith CEO

Date: 23rd August 2021



Our business and supply chains

This statement is published by Young's Seafood Ltd in accordance with section 54(1) of the Modern Slavery Act 2015. It sets out the steps we are taking during our financial year ending 30th September 2021 to prevent Modern Slavery and Human Trafficking in our own business and our global supply chains.

Young's Seafood Limited is the largest manufacturer of value added fresh, chilled and frozen seafood products in the UK. Whilst we're predominantly a seafood business, we also manufacture some added value and recipe meal products using other types of protein such as beef.

We have manufacturing sites in England, Scotland and Northern Ireland, producing food products that carry the Young's suite of brands as well as major multiple retailer own labels.

We procure raw materials from both domestic UK fisheries and fish farms as well as from overseas sources. We also buy non-fish raw materials, recipe ingredients, packaging items and a range of other goods and services.

Our policies and contractual controls

The business operates a number of policies across the business to combat modern slavery which are regularly reviewed by senior management.

The majority of raw materials, co-packed products, ingredients, packaging items, goods and services are procured by a central Procurement Department under the management of a board level director. In the instances where smaller purchases of items such as packaging materials are required to be made at a manufacturing site level, these purchases are controlled in accordance with central management systems and protocols. We have a rigorous process which governs the award of all commercial contracts, sourcing from businesses that meet our strict commercial and technical standards. This includes an automated country-level risk-based metric and a Self-Assessment Questionnaire (SAQ) risk test for the likelihood of modern slavery within the supply chain. All risk assessment results are checked by a Lead Auditor prior to any contracts being awarded.

Within our own manufacturing facilities, we have Human Resource policies on Preventing Hidden Labour Exploitation and Whistleblowing, and we have introduced an Ethical Policy and commitments across our sites. These policies apply to all our employees.



Due diligence and audits of our suppliers and supply chain

We are a member of the Supplier Ethical Data Exchange (Sedex). So that we can conduct effective risk analysis of our supply chains. With the exception of a very small number of suppliers where a risk-based assessment has indicated a low likelihood of hidden labour exploitation, we require our suppliers to register themselves onto the Sedex system and to allow us to see their audit results and self-assessment details.

Our suppliers are assessed in terms of their vulnerability to hidden labour exploitation. Members of our commercial and technical teams (or our appointed and approved representatives) visit our suppliers on a regular basis and audits are carried out in accordance with a schedule based on risk. During the global Covid-19 pandemic it has not been possible to conduct as many on-site visits and audits as we would typically expect to do, but in order to maintain focus on hidden labour exploitation risks in our supply chains, we have continued to conduct audits remotely, using pre-prepared audit templates and on-line video inspections.

Some supply chains are externally audited against third party standards which include an assessment of the ethical treatment of labour. For example, we source aquaculture products from supply chains certified to the Aquaculture Stewardship Council and the Global Aquaculture Alliance and 100% of our palm oil (and palm derivatives) comes from suppliers certified to the Roundtable on Sustainable Palm Oil (RSPO) scheme.

We are committed to working with Labour suppliers to follow the Responsible Recruitment toolkit.



Performance Measures and Actions

We have agreed several key performance indicators which are used not only to monitor our own performance, but to report to external interested parties how we are doing against our policy and standards.

Performance Indicator	Results 2019/20	Results 2020/21
% of Youngs employees who have completed Stronger Together Training.	57%	72%
% of Youngs sites who have completed agency labour audits on a six-monthly basis.	100%	100%
Number of non-conformances raised during six monthly agency labour audits.	1	4 *
% of whistle-blower cases related to modern slavery issues.	0%	0%
% of all whistle-blower ('Safecall') cases closed out.	100%	100%
% of tier 1 suppliers registered and linked to Youngs Seafood Ltd. on SEDEX.	95%	95%

*As part of our continued effort to tackle modern day slavery, we have upgraded our agency audit standards over the last 12 months. Our new accredited standard assesses our providers against a broader array of social standards that include but is not limited to the GLAA licensing authority, responsible recruitment, stronger together, the ETI base code, Dhaka Principles and so on. This new standard assesses more than 150 critical control points. This is more than the double the size of our previous audit standard. This upgrade has helped us develop greater transparency, integrity and compliance across our business and we are enthusiastic about developing these standards even further over the next few years.

The KPIs underpin our focus on improving modern slavery risk awareness and understanding across our business and throughout our supply chain.



Due diligence in our at-sea supply chains

The assurance of ethical working conditions on fishing vessels is an ongoing challenge for buyers of wild-captured seafood. Young's Seafood Ltd. has been at the forefront of the development of new supply chain tools for this difficult-to-reach part of the seafood industry.

We held a seat on the Oversight Board of the Responsible Fishing Scheme (RFS) from its launch in 2016 until it was superseded by Version 1 of the Global Seafood Assurances Responsible Fishing Vessel Scheme (GSA RFVS) in 2020. During this period, we were active in the development and roll-out of the scheme to UK registered vessels in our supply chain. We're also supportive of the roll out of the new GSA RFVS scheme to both domestic and international fisheries. Recognising the challenges of the Covid-19 global pandemic it is difficult to estimate how long it will take to achieve full roll-out of the GSA RFVS across all of our at-sea supply chains but we will continue to work towards this as a long term goal.

During the 2020/21 financial year, we continued to engage on a pre-competitive basis with other stakeholders in the wider industry through our participation in the Seafood Ethics Action Alliance (SEA Alliance). Through the SEA Alliance, we have supported a number of national and international initiatives to promote improvements in human rights in wild capture fisheries, including our endorsement of the Environmental Justice Foundation's Ten Principles for Global Transparency in the seafood industry: <https://ejfoundation.org/reports/the-ten-principles-for-global-transparency>. During 2020/21, we continued to participate in a SEA Alliance working group to develop and implement the recommendations of the PAS1550 Code of Practice for exercising due diligence in establishing the legal origin of seafood products and marine ingredients.



Our anti-slavery training

To raise awareness within our own business, we have signed up to be a business partner of Stronger Together, the multi-stakeholder initiative aiming to reduce modern slavery.

In our Modern Slavery statement for 2018/19, we announced an action plan that aimed to raise understanding and awareness levels of modern slavery risks within our own business and in our upstream supply chains. This has been an ongoing program, rolling forward into our 2019/20 and 2020/21 financial years. The strategy began with the training of our key operational, supply chain, technical and Human Resource management colleagues, and included:

- Training members of the Purchasing and Technical teams who attended the Stronger Together Workshop on Tackling Modern Slavery in Global Supply Chains
- Training members of the HR team who attended the Stronger Together Workshop on Tackling Modern Slavery in UK Businesses
- Developing our 'Preventing Hidden Labour Exploitation' online management module and our Line Manager Guide to Slavery.
- Including 'Preventing Hidden Labour Exploitation' in our staff induction pack. This is complimented by a modern slavery questionnaire which is assessed by local HR teams trained to identify risk.
- Developing the "Welcome to Young's Seafoods - Our everyday commitment to worker standards" which is issued to all new employees and agency workers upon commencement and annually thereafter. The document includes the Stronger2gether message and the GLAA worker standards philosophy.

Since introducing this policy, we have continued in 2020/21 to:

- Monitor the workplace to identify any signs of workers experiencing issues
- Make clear our policy on accepting inducements or other forms of worker maltreatment
- Review our audit programme to make recommendations for improvements against anti-slavery requirements and industry best practices.
- Train our security staff to monitor 'alert flags', and direct cameras and Security Officers to areas where workers disembark from any transport to work to monitor suspicious activity.
- Ensure that human trafficking and forced labour is on the agenda at our regular employee briefings/Engagement Forums/Union meetings. By making Modern Slavery a standing agenda item on our business Joint Consultation Groups (JCGs), we ensure that this remains an ongoing agenda for all employees.