

## Modern Slavery Statement

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*This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by Seafresh Group (Holdings) Limited and other group companies (SFG)<sup>1</sup> during the year ending 31 December 2020 to prevent modern slavery and human trafficking in its business and supply chains in the UK and globally.*

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### Introduction

This is our fifth Modern Slavery Statement and in the past 12 months we have consolidated our work of previous years to address issues of modern slavery and improved our management of risks. This statement describes our actions undertaken in 2020, both individually and collectively as a member or partner of industry and cross sectorial organisations, and it reports some quantitative indicators that describe the situation of our supply chain. We also elaborate on goals identified as priorities to continue improving the way we address human rights and modern slavery in our operations and supply chains.

SFG's main activity is the production, sourcing and distribution of seafood and aquafeed products in several countries on a global scale. In the UK, SFG sources, adds value, packs and distributes seafood products for the retail sector. SFG also operates production facilities and employs people in other countries, the largest being in Thailand, through its parent company Seafresh Industry Pcl.

SFG is committed to identifying and addressing any form of slavery or trafficking of workers, both in our own operations in relation to worker recruitment routes, and in our supply chains. We define "slavery" as every form of slavery, servitude, forced labour or compulsory labour, and "trafficking" as facilitating the travel of someone for the purpose of exploitation. Our statement also covers the risk of discrimination and child labour, which we define as work that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical and mental development<sup>2</sup>.

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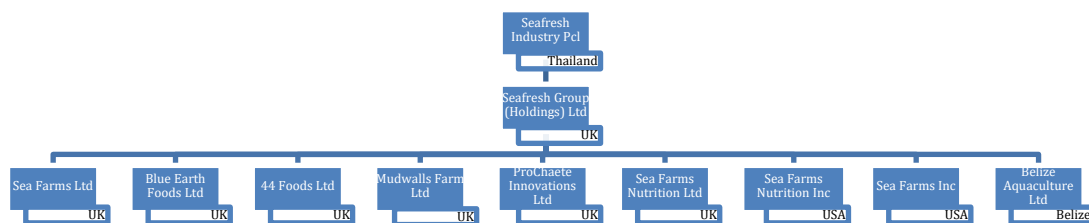
<sup>1</sup> Companies covered by this statement include Blue Earth Foods Ltd and Sea Farms Ltd based in the UK and their seafood supply chain, including products from SFG companies Sea Farms Nutrition Ltd, ProChaete Innovations Ltd, Seafresh Industry pcl and Belize Aquaculture Ltd, as well as third-party suppliers.

<sup>2</sup> Taken from the International Labour Organization (ILO)

## Structure and Supply Chains

SFG is a holding company controlled by Seafresh Industry Pcl (based in Thailand), that includes Sea Farms Ltd, Blue Earth Foods Ltd, 44 Foods Ltd and Mudwalls Farm Ltd based in Redditch in the UK (Figure 1). SFG also includes Sea Farms Nutrition Ltd and ProChaete Innovations Ltd in the UK, and Sea Farms Nutrition Inc in the US, which develop, produce and distribute feed ingredients and specialty feeds. Sea Farms Inc in the USA imports and distributes seafood products for the retail market. Belize Aquaculture Ltd and Seafresh Industry pcl are producers and exporters of farmed shrimp. SFG sources seafood for the UK market from its own operations and also from third-party suppliers located in the UK, Europe, Asia, and the Americas.

SFG seafood products originate from both fishing and aquaculture operations, from more than ten countries, including the UK.



**Figure 1.** Structure of Seafresh Group (Holdings) Limited and associate companies.

SFG’s seafood products include farmed and wild species of molluscs, crustaceans and to a very small extent fish. Warm water prawns are the main species produced and sourced by the Group in tropical countries, including Thailand, Belize, Honduras, Costa Rica, Vietnam, and Madagascar. Feeds used in farms include marine ingredients made from species caught in the oceans. Such feed ingredient supply chains are complex, and in some cases, there is limited visibility on the origin of the fish and of the labour conditions on board of these vessels supplying the fish used to make feed ingredients.

SFG’s Director of Sustainability is responsible for the implementation of control measures of ethical risks in the supply chains. Human Resources and Supply Chain Development teams manage the control measures in all Group operations and supply chains.

## Policies

SFG has adopted **Human Rights** and **Ethical Sourcing policies** which state our commitment to maintaining transparency in our supply chains, assessing risks to human and labour rights, and remediating any situation of abuse that may be identified. It is complemented by a **Sustainability policy** which recognises the responsible management of social aspects as a key component of the overall sustainability of our business, and an **Anti-Bribery and Corruption policy**, which sets the rules for an ethical conduct for all SFG employees when discharging their duties and functions.

Additionally, SFG subsidiaries have specific Human Resources policies and procedures relative to the country of operation and covering employment conditions and the responsibilities of the company with all employees.

All SFG companies commit to comply with national regulations and adhere to the principles of the Ethical Trading Initiative Base Code, and we expect the same commitments from all our suppliers. Our expectations on good social, environmental and governance practices have been documented in “strategic suppliers guiding principles” and communicated to key suppliers in Thailand. We are a member of the Supplier Ethical Data Exchange (Sedex) and we contributed to its initial development as a Board member.

SFG is committed to maintaining transparency of its supply chains and informing its customers of challenges and improvements. We are committed to tackling illegal, unreported and unregulated (IUU) fishing, which links in many cases with risks of slavery and human trafficking. We select sources of sea products that are certified to the Marine Stewardship Council (MSC) or MarinTrust in the case of feed ingredients, or suppliers who work towards these certifications.

SFG actively supports industry initiatives that work for the establishment of responsible practices in the fishing and aquaculture sectors. We are members of the Global Aquaculture Alliance (GAA) and we actively contribute to the development of the Aquaculture Stewardship Council (ASC) and Responsible Fishing Vessel Scheme (RFVS) certification standards, which all promote the adoption of responsible labour and social practices in the aquaculture industry. We support and contribute to Seafish and industry initiatives such as the Seafood Ethics Action Alliance (SEA Alliance) in the UK in favour of responsible practices in the seafood industry, including the development of risk assessment and due diligence protocols and advocacy activities. In 2017, SFG joined the Sustainable Seafood Coalition, an organisation that sets voluntary agreements on due diligence requirements for the responsible sourcing and labelling of seafood, based on legality and sustainability criteria, including social aspects.

## Risk Assessments

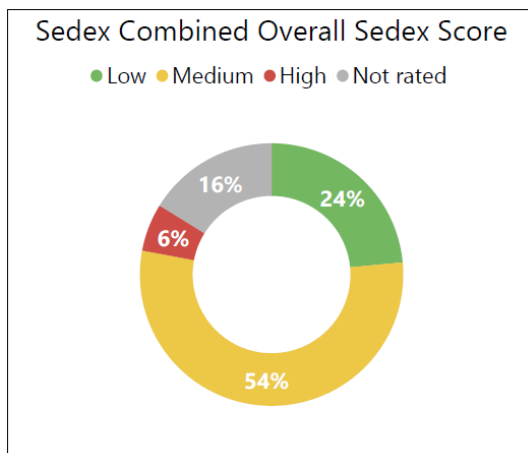
A key preliminary condition to conduct risk assessments is to obtain visibility of the entire supply chain and collect the necessary data. We have two main ways of collecting information from suppliers: (i) the Sedex platform: we require all tier 1 suppliers to register on Sedex, complete the self-assessment questionnaire (SAQ) and provide us with visibility of all their information, including ethical audits; (ii) we ask all tier 1 suppliers to complete our own questionnaires and templates to collect complementary information about their operation and their supply chain at least up to tier 4. The availability and accuracy of the information is verified through regular traceability exercises and supplier audits. We monitor the visibility and completeness of their information on management practices in the Sedex SAQ and other questionnaires (Table 1).

**Table 1.** Visibility of labour management information within SFG operations and its seafood supply chain.

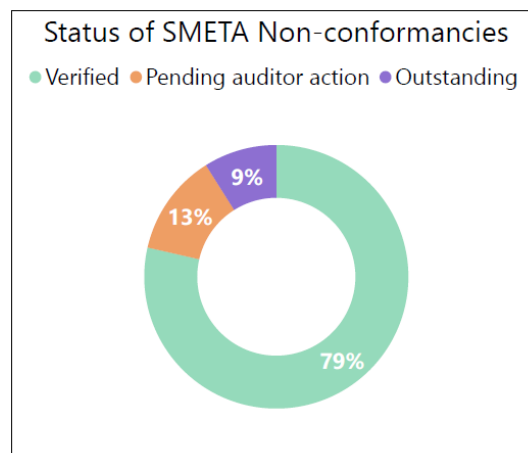
Supply chain level	Operations	Visibility level and mechanisms
Tier 0	SFG production and distribution companies in the UK	100% via Sedex and audits
Tier 1	UK labour providers	100% via audits
	Direct suppliers (processors, manufacturers) of seafood products	100% via Sedex, questionnaires and audits
	Direct suppliers (processors, manufacturers) of other ingredients	93% via Sedex, questionnaires and audits
Tier 2	Farms (including SFG owned), Fishing vessels	100% via questionnaires, product traceability and audits
Tier 3	Hatcheries (including SFG owned)	100% via questionnaires, product traceability and audits
	Feed mills	100% via questionnaires, feed traceability, audits and Sedex
Tier 4	Sources of fish ingredients used in aquafeeds	100% via questionnaires, feed traceability and audits

We then assess the risk level of all suppliers, and use this to determine the level of scrutiny we apply to the various suppliers.

A standard risk assessment tool used with all direct suppliers of food ingredients is the Sedex risk rating. In 2020, we moved to using the new Sedex risk assessment tool called Radar. In 2019, 24% of all direct supplier sites were rated low risk on Sedex and 6% were rated high risk, whilst 16% could not be rated due to missing information (Figure 1). We also monitor the completion of corrective actions with suppliers submitted to ethical audits, and if needed we follow up with them. At the time of writing this statement, 79% of 2020 audit non-conformities have been closed out by seafood suppliers (Figure 2).



**Figure 1.** Sedex risk rating of all direct supply sites linked to Seafresh Group on Sedex. This includes seafood products and other ingredients used in the manufacture of value-added products.



**Figure 2.** Status of non-conformities as of 13<sup>th</sup> July 2021 for all SMETA audits of seafood suppliers carried out as of 31<sup>st</sup> December 2020

Additionally and to complement Sedex risk ratings of tier 1 suppliers, SFG has developed a risk assessment methodology specific to seafood production, to map out the different types and levels of ethical risks along each supply chain and specific to the type of activity. The structure is based on decision trees that are specific to labour agencies, land-based production facilities and fishing fleets separately due to the specific risk factors involved in the different types of activities.

Facilities, sources of raw materials (fishing fleets, fisheries) and supply chains are rated based on our decision trees as Low, Medium or High risk, and that determines our level of scrutiny and action for mitigating risks. This assessment is based on country-specific information (such as the ratification of ILO conventions, the Corruption Perceptions Index, the Trafficking-In-Person report<sup>3</sup>, and criteria relating to Illegal, Unregulated and Unreported fishing due to its common link with labour issues), supplier specific information from third-party assessments (such as certifications and Sedex) and our knowledge of their situation from both internal and external (NGOs) information.

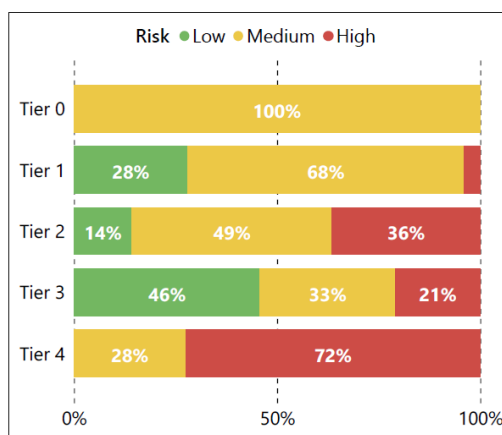
We consider all reliable reports from governmental agencies, NGOs or the media on specific issues in specific countries or activities relating to seafood production. We also establish partnerships with NGOs in countries of critical importance, such as Stronger Together in the UK, and the Issara Institute and the Seafood Task Force in Thailand, which provide us with insights on risks in specific activities based on their own independent assessments, and also recommendations on measures to be

<sup>3</sup> US Department of State Trafficking In Person report available at <https://www.state.gov/reports/2020-trafficking-in-persons-report/>

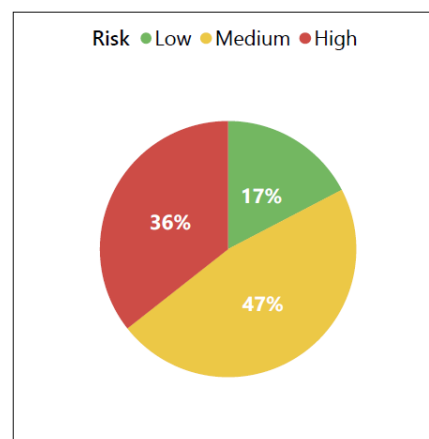
considered for mitigating those risks. We review and update decision criteria every year to consider and integrate new tools and resources used in the seafood industry and the world of ethical sourcing. Consequently, the risk ratings of our supply chain are not comparable year on year as a performance indicator. Instead, they support the identification of priorities for planning mitigation actions.

The SFG facility based in Redditch, UK is rated medium risk (Table 2) as a result of issues raised in the UK relating to the potential trafficking and exploitation of migrant workers. The reliance on migrant labour is a common source of risks identified throughout the supply chain, especially in the fishing sector. Visibility and verification of employment conditions are another common source of risk. These risks are low in aquaculture production facilities, especially at tier 3 level (hatcheries and feed mills), which are all audited or certified to standards that in most cases cover social aspects (Table 2, Figure 3). Risk levels are higher with fishing vessels and the production of feed ingredients, where the visibility and verification of employment conditions is limited (Table 2, Figure 3). Overall, only 17% of all facilities and sources in the seafood supply chain are rated Low Risk (Figure 4) and we take actions to mitigate risks.

When considering countries of production, high risk facilities and sources (Table 3) result from inherent country risks combined with either a lack of visibility of working conditions on board fishing vessels, a lack of third-party verification or the reliance on migrant labour.



**Figure 3.** Risk levels as % of seafood facilities or sources rated Low (green), Medium (yellow) of High (red) risk within SFG supply chain by tier level in 2020.



**Figure 4.** Risk levels in the overall SFG seafood supply chain as % of seafood facilities or sources rated Low (green), Medium (yellow) of High (red) risk in 2020.

**Table 2.** Human and labour rights risk levels (expressed as % of number of facilities, fishing fleets or sources) within SFG operations and the seafood supply chain, with indication of identified challenges and issues.

Supply Chain Level	Operations	Risk Rating			Challenges and issues identified
		Low	Medium	High	
Tier 0	SFG production facilities in UK (Blue Earth Foods)	0%	100%	0%	Migrant workers, recruitment, workers voice
Tier 1	UK Labour providers	0%	100%	0%	Migrant workers recruitment
	Direct suppliers to SFL (processors & manufacturers), including SFG-owned	30%	65%	4%	Migrant workers recruitment, Employment conditions
Tier 2	Farms, including SFG-owned	3%	7%	90%	Migrant workers recruitment, Employment conditions
	Fishing vessels	0%	72%	28%	
Tier 3	Nurseries and Larvae Culture Facilities	100%	0%	0%	Migrant workers recruitment, Employment conditions
	Hatcheries, including SFG-owned	36%	18%	45%	
	Feed Mills	33%	67%	0%	
Tier 4	Feed Ingredient Sources (farmed raw material)	0%	100%	0%	Sourcing certified materials, Migrant workers recruitment, Employment conditions
	Feed Ingredient Sources (wild raw material)	0%	22%	78%	

**Table 3.** Summary identification of risk locations in SFG seafood supply chain.

Operations	Low risk	Medium risk	High risk
Direct suppliers (Tier 1)	Argentina, China, Costa Rica, Honduras, Madagascar, Vietnam	Canada, Denmark, Iceland, Spain, UK	Thailand
Fishing fleets (Tier 2)	None	Argentina, Canada, Denmark, Iceland, Spain, UK, USA.	Canada, China.
Aquaculture facilities (Tiers 2 and 3)	Honduras, Thailand, Vietnam	Costa Rica, Honduras, Thailand, UK.	Costa Rica, Madagascar, UK, USA
Feed ingredients (Tier 4)	None	Honduras	Costa Rica, Honduras, Thailand

## **Due diligence and risk mitigation**

We work to enable full visibility of our supply chains back to individual fishing vessels, farms, and suppliers of marine ingredients used in aquafeeds. This is maintained through questionnaires filled by our suppliers, which details the structure of their supply chain, and a comprehensive traceability system that allows for identifying all facilities involved in the custody of any product lot. Our traceability goes back to feed ingredient producers and supply vessels. Our staff periodically visit suppliers and inspect facilities to verify working conditions and information on their supply chain.

We are involved in a number of memberships that provide tools and mechanisms for identifying and mitigating risks in our own operations and our supply chain (Table 4). We participate in industry exchange fora such as the Seafood Ethics Common Language Group in the UK or the Issara Institute and the ILO in Thailand, for improving our level of awareness and understanding of risks of modern slavery. In 2018 we joined the Seafood Ethics Action (SEA) Alliance, a group of UK seafood companies that decides on joint actions for mitigating ethical risks in the seafood industry.

We request that all our direct suppliers register as member of Sedex and fill in the self-assessment questionnaire, which allows for a risk rating generated by Sedex algorithm. We also collect additional information through an internal questionnaire, permanent communication and periodic visits of suppliers. All seafood direct supply sites are requested to conduct periodic SMETA audits, and audit reports and corrective actions are visible to us and our customers on Sedex. We follow up with suppliers to ensure that issues are addressed, and corrective actions are verified.

We also monitor how suppliers fulfill their own obligations of complying with modern slavery laws applicable to them. In 2020, all suppliers (6 of them) which were required by applicable national legislation to publish a modern slavery statement did so.

All aquaculture facilities in our supply chain, including farms, hatcheries and feed mills are certified against Best Aquaculture Practices (GAA) and ASC standards (Figure 4), which allow for reducing labour risks. In relation to feed ingredients of marine origin, we work with feed suppliers for selecting sources that are certified to MSC or MarinTrust, which ensures traceability and allows for verifying the absence of IUU fishing. Also, it indirectly reduces risks of modern slavery as experience has shown that issues of illegal fishing and bad labour practices are commonly linked.

As part of the activities of the SEA Alliance, we have actively participated in the evaluation of PAS 1550:2017 “Exercising due diligence in establishing the legal origin of seafood products and marine ingredients”. The objective is to contribute to the improvement of procedures used in our industry to control the risk of illegal fishing, which is known to be linked to issues of human trafficking and worker exploitation. Another example of action in the area is that we joined a working group coordinated by the Sustainable Fisheries Partnership and formed to address issues of IUU fishing in global squid fisheries. This group will partner with NGOs that use technology and intelligence data from the monitoring of fishing vessel activity to deter illegal fishing.



**Table 4.** SFG memberships that help to address human and labour rights.

Organisation name	Country	Purpose and benefits to SFG
SEDEX	UK	Platform used for collecting and analysing information on employment practices of all suppliers, to help identify issues and risks on human and labour rights.
Stronger Together	UK	Provides materials and tools for raising awareness of employees on modern slavery and implementing prevention and detection management procedures.
Seafish	UK	Supports intelligence development through risk assessment tools, discussion groups such as the Seafood Ethics Common Language Group and certification of fishing vessels under the Responsible Fishing Scheme.
Seafood Ethics Action Alliance	UK	Stimulates collaboration with our peers within seafood companies for taking group actions for preventing ethical risks in the industry.
Sustainable Seafood Coalition	UK	Sets voluntary rules for responsible sourcing of seafood products that we commit to comply with in all our supply chains.
Issara Institute	Thailand	Operates an independent call centre available to all our workers in Thailand; supports Seafresh in identifying and addressing ethical challenges internally and in our supply chain.
Seafood Task Force	Thailand	Bring the seafood industry, NGOs and the Thai government together to tackle issues and risks of modern slavery. Allows for agreeing concerted actions on recruitment and employment practices of migrant workers.
Global Aquaculture Alliance	Global	Best Aquaculture Practices certification that covers employment practices and is used across our aquaculture supply chains.
International Association for Women in the Seafood Industry	Global	Raises awareness on the contribution of women in the seafood industry and promotes a more gender balanced industry.
Global Dialogue on Seafood Traceability	Global	Develops standards for the electronic traceability of seafood products for improving the transparency and reliability of supply chains.
Sustainable Fisheries Partnership	Global	Squid IUU working group formed out of the Squid Roundtable. The objective is to identify and address situations of IUU fishing in global squid fisheries.

In case of specific high risks, we engage with NGOs and other organisations for improving our level of oversight of supply chains and better mitigating risks. In Thailand, SFG is an active member of the Seafood Task Force (STF), which develops mechanisms for establishing an oversight of the entire prawn supply chain back to the origin of fish used for making fishmeal. This work covers legality aspects of both the fishing activities and working conditions of the entire Thai supply chain. SFG is an active participant in working groups aiming to improve the traceability of feed ingredients of marine origin and to implement fair recruitment practices for migrant workers. SFG is also supporting financially a collaboration between the Seafood Task Force and the Thai Department of Fisheries for upgrading the vessel monitoring and control systems in Thailand, which covers employment conditions of crews. After focusing on improving the vessel monitoring system and Port State Measures

operated by Thai authorities to control risks of IUU fishing with the domestic fleet and fish imports, respectively, their work is now extending to the automatic detection of risks of labour issues based on computerized analysis of vessel behaviour and historical data, and also the training of port inspectors on the verification and investigation of labour aspects on fishing vessels.

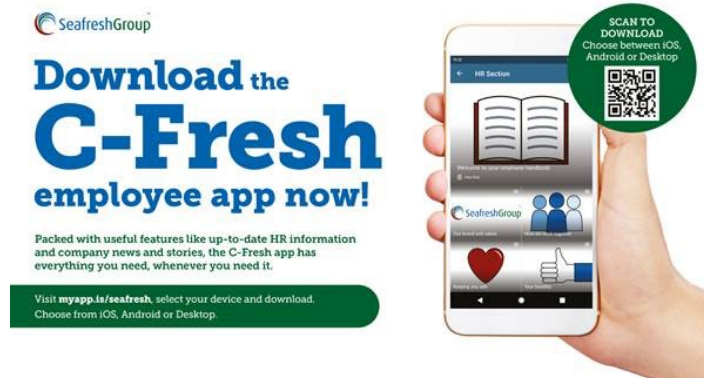
### ***Workers Voice mechanisms***

We provide training to all our direct employees on ethical risks as part of the induction process, using materials from Stronger Together in the UK, or in collaboration with the Issara Institute in Thailand, for raising awareness on potential issues related to modern slavery and capacity of appropriate reaction within our staff, including access to anonymous grievance mechanisms. This work extends to suppliers in Thailand, to raise their awareness of the issues and facilitate understanding and collaboration.

SFG companies and some suppliers have established workers committees and works councils with worker representatives to discuss with company managers any concerns and suggestions for improvements. Workers representatives play a key role in facilitating the communication between their peers and the company. We also use staff surveys, whistleblowing hotlines and other proactive, direct communication channels for informing employees of changes and decisions that affect them, detecting any issue and monitoring the level of satisfaction of employees. We also explore the use of technology for improving communication. In the UK, we launched in June 2020 a phone app for sharing information with all employees and also used as a 2-way communication between company management and workers, including the possibility of anonymous grievance (see case study N°1). We have mechanisms in place for responding to complaints and issues with the appropriate involvement of company managers.

SFG is also a partner of the Issara Institute in Thailand. We work closely with the Issara team to promote the access of workers employed at our own facilities and by suppliers to Issara's independent call centre, analysing workers' complaints and questions received, and addressing issues identified. Issara also provides workers, particularly migrant workers, with information on legislation and any aspect of their life in Thailand via their call centre and their phone app Golden Dreams.

### Case study N°1 – Innovating internal communication using smartphone technology.



Phone apps have become a better way to share information than emails; it gives all our employees the ability to easily access information we provide. The C-fresh app was launched in June 2020 in our UK operation.

Company information and announcements are regularly posted on the C-fresh app providing us with a great way to reach out to our employees and bring new and important developments to their attention. We also use it as a tool to circulate more general information; in particular it helps us to continually raise awareness on modern slavery.

The app also includes a way for employees to ask questions and make complaints anonymously, providing an innovative, alternative grievance mechanism.

### ***Responsible recruitment***

In the UK, SFG’s site is a Stronger Together business partner and has implemented their awareness and prevention methodology. Our labour providers are also Stronger Together business partners, and we audit them regularly to verify the application of procedures to mitigate risks of human trafficking in their recruitment process. In 2020, we issued a new “Guide for Managers and HR practitioners on Concerns regarding Modern Slavery or Hidden Labour Exploitation” to complement our policy on “tackling modern slavery and hidden labour exploitation” with clear guidance and practical instructions on what to do in case of suspicions of human trafficking, forced labour or worker exploitation.

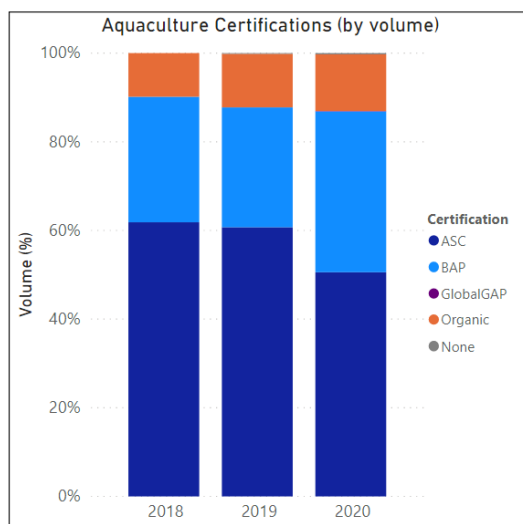
In Thailand we work with recruitment agencies and the Issara Institute to participate in and control the recruitment process in workers’ country of origin and verify that recruitment conditions are fair and transparent. Our due diligence includes written agreements with recruitment agencies on professional and ethical services to jobseekers, including transparency of hiring conditions, pre-departure training and information, and remediation procedures. There was no recruitment of foreign workers from their home country in 2020, because of immigration and travel restrictions in place in Thailand, in response to the Covid19 pandemic. However, we continued our involvement in the Seafood Task Force training activities based on the Fair Hiring Initiative standard called “On the Level”, which provides step-by-step

guidance and set of requirements for recruitment agencies to achieve internationally recognised responsible recruitment practices. Our recruitment agency in Myanmar attended all training sessions and was audited to establish a baseline evaluation of compliance, which was complemented by interviews of Seafresh employees to collect information about their recruitment experience. New, improved service agreements have been drafted to clarify respective responsibilities to ensure responsible recruitment practices.

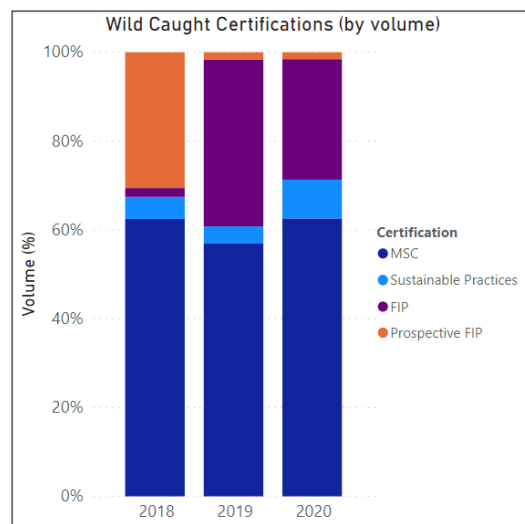
### Measuring progress

Since 2020, we have been monitoring internal KPIs to monitor the performance of our supply chain against objectives. We evaluate the effectiveness of measures taken to identify and prevent risks, and remediate issues based on indicators of risk levels and issues addressed at the various steps of the supply chain (Tables 2 and 3). One of our key objectives is that all our seafood sources achieve third-party certifications that validate the responsible management of fisheries and aquaculture production. In 2020, 100% of our farmed seafood was certified to a third-party scheme (Figure 4), and 63% of our volume of wild species was certified to MSC (Figure 5). Other sources are all involved in credible improvement projects that validate their responsible management.

In 2020, we have amplified our collaboration with Fair Trade USA to implement progressive mechanisms of worker empowerment, and achieved the certification of our Thai operation (see case study N°2).



**Figure 4.** Certification status of the SFG aquaculture supply chain to farm level as % of volume sourced in 2020.



**Figure 5.** Certification status of the SFG wild species supply chain to fisheries level as % of volume sourced in 2020.

### **Case study N°2 – Extending the Fair Trade USA certification**

Seafresh Group has been an historical supporter of Fair Trade because we have the same interest in generating Shared Value along the supply chain, and in benefiting and empowering small holders and workers. When Fair Trade USA were looking for partners for piloting the certification of aquaculture producers in 2018, working together came as an evidence. Our collaboration resulted in our historical supply partner in Honduras to be the first shrimp producer worldwide to be certified by Fair Trade in 2019. Now the Fair Trade premium generated by our shrimp sales in the USA is used by the local Fair Trade premium committee to alleviate poverty in coastal Honduran communities.



Seafresh operation in Chumphon was next to apply to certification in 2020, which was successfully achieved in January 2021. Beyond the value of the product label that allows for consumers to make positive shopping decisions, the validation of compliance with very demanding Fair Trade standards confirms the progressive social policies and practices in place in the company. It involves guaranteeing fair employment conditions beyond legal compliance, giving workers a voice and empowering them, in particular through the management of the Fair Trade premium fund.

### ***Continual development***

We will maintain and intensify our efforts in 2021 in three focus areas:

- 1) The development of tools and procedures for reducing and addressing ethical risks in our seafood supply chain, including contributing to industry initiatives.

We have reviewed and modified our supply chain risk criteria based on new knowledge of risk factors and the development of new assessment tools. We will keep verifying that our assessments of risks remain relevant and accurate.

As part of the activities of the SEA Alliance, we will continue our participation in the development of PAS 1550:2017 “Exercising due diligence in establishing the legal origin of seafood products and marine ingredients”, with the objective of writing additional guidance on the implementation of practical measures that seafood companies should have in place.

We have joined the Global Dialogue on Seafood Traceability (GDST), which provides transparency of supply chains as a condition to social responsibility, and we will be testing in 2021 the use of an electronic platform to implement traceability across an entire supply chain in full compliance with the GDST standard.

We contributed to the development of a new social policy adopted by fisheryprogress.org that introduces obligations of due diligence to control labour risks in fishing fleets as part of Fishery Improvement Projects (FIP). We will start implementing the new policy in 2021 in the FIPs we are involved in.

- 2) The improvement of due diligence activities both internally and in our supply chain, and monitoring performance.

Following the adoption of a new Human Rights policy, we will develop a strategy for ensuring compliance with commitments within our operations and in our supply chain. This will include improved communication on risks and due diligence processes in line with our principles and objectives.

We will continue improving the monitoring of relevant KPIs for evaluating the performance of our supply chain and measuring progress.

- 3) the progress of mechanisms to ensure the responsible recruitment of workers based on international principles and the access to grievance mechanisms.

The impact of Covid19 restrictions has resulted in a strong limitation of recruitment activities, and the priority in 2020 has been adopting prevention measures to protect employees, including providing personal protective equipment, conditions for physical distancing and support for quarantines and home working. This will remain a priority in 2021, but we will also continue preparing for improved recruitment conditions when immigration channels reopen.

In Thailand we continue our participation in the Seafood Task Force (STF) and the Fair Hiring Initiative training programme for providing Thai member companies and their recruitment agencies with guidance and support on the development of responsible recruitment principles and procedures. We will continue in 2021 our efforts to comply with the responsible recruitment standard On-The-Level. We will also implement in 2021 the new STF due diligence programme to ensure compliance of our Thai supply chain with the STF Code of Conduct.

In our UK operation we will continue improving our C-fresh app and collaborate with customers to test new technology solutions as a way to collect feedback from workers.

We will be working with the SEA Alliance to investigate projects on the water to overcome ethical issues. Whilst there are mechanisms in place to protect crew onboard vessels, we aim to build on this for our supply chains.

This statement was approved by the Board of Directors of Seafresh Group (Holdings) Limited on the 29<sup>th</sup> July, 2021.



Lasse B. Hansen, CEO