



Young's Seafood Modern Slavery Statement 2019/20

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

20th April 2020



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 2020 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.

All 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. 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 a risk test for the likelihood of modern slavery within the supply chain.

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.

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



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.

With a seat on the oversight board of the Responsible Fishing Vessel Scheme (RFVS) since its re-launch in 2016, we have been active in the development and roll-out of the scheme and are working to deliver our target that all of our UK supply chains will be RFVS certified or engaged in the process of certification by the end of 2020. We're also supportive of the roll out of the RFVS scheme to international fisheries and expect that these supply chains will also be certified or engaged in the process of RFVS certification (or an equivalent standard), by the end of 2021.

During the 2019/20 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 2019/20, we have also actively participated 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 financial year. 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 team 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 2019/20 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.