



Modern-day Slavery Statement

This statement is published by Young's Seafood Ltd in accordance with section 54(1) of the Modern-Day Slavery Act 2015. Young's Seafood Ltd is a proud subsidiary of the Sofina Foods Group and forms part of a global food business that has operations in the UK, Europe and Canada.

We are committed to tackling and preventing modern day slavery, human trafficking and hidden labour exploitation, in the network and supply chains in which we operate. This statement sets out the progress we have made to this commitment for the period covering 1st April 2023 to 31st March 2024.

Organisational Overview

We are a privately owned food manufacturing business that specialises in the production of seafood and shellfish. We are recognised as one of the leading seafood manufacturers in the UK and have built our reputation on doing the right things for our customers, colleagues and communities. We work with hundreds of suppliers and have a global supply chain that includes ethically farmed seafood, wild caught seafood and sustainably sourced raw materials, such as soya and palm oil. We tackle and prevent exploitation through several key areas:

- Organisational structure & accountability
- Policies & procedures
- Due diligence & risk assessment
- Training & awareness
- Monitoring & measuring

The development of these areas is managed and monitored through our tailor-made exploitation prevention plan.

Organisational Structure & Accountability

Our board of directors take up accountability for our corporate governance and our broader commitments to social and ethical development. The prevention of modern-day slavery is a fundamental part of our social commitments and business values. Our commitments are underpinned by a progressive culture that promotes openness, honesty, integrity and continuous improvement. As an organisation, we are active members of several relevant industry groups such as F-Net, Stronger Together and the ethical seafood Action Alliance. This year we are very proud to have become members of the ALP. These memberships ensure that we can create a positive social change across our entire industry.

Policies & Procedures

We have a range of policies that are designed to prevent, minimise and respond to exploitation in our business and our wider supply chain. These policies include, modern-day slavery, whistleblowing, human rights, child labour, remediation and



responsible recruitment. Our policies are based on recognised social standards such as Stronger Together, ILO and the ETI base code. Our policies are a critical part of our exploitation prevention plan and ensure that we have the proper controls in place to manage and monitor ethical compliance.

Due Diligence & Risk Assessment

Suppliers are assessed and reviewed on a regular basis in terms of service levels, vulnerability and risk. We work closely with suppliers to ensure that we develop service levels, risk prevention and working conditions across our entire supply chain. Suppliers are obliged to report and monitor working conditions through an industry platform known as Sedex. Sedex is reviewed regularly as part of our due diligence process and forms a part of our assessment procedure.

Training & Awareness

We conduct modern-day slavery training as standard. It forms part of our induction and refresher programmes. Employees are trained specifically on how to spot and report cases of suspected exploitation. Employees in roles of added responsibility, such as in HR and Procurement, undertake specialist training in areas related to modern day slavery such as Stronger Together, Gangmasters Licensing and Auditing.

Monitoring

We monitor and measure for signs of exploitation through several key indicators:

- Number of whistleblowing reports concerning exploitation
- Number of reports through our exploitation reporting procedure
- Number of non-conformances on audits
- Number of GLAA alerts
- Number of social, ethical and compliance control point breaches
- Number of Sedex alerts
- Number of NCs obtained at SMETA and SWA audits
- Number of risk factors identified during pre and post supply audits
- External media stories and industry updates

From these monitoring systems, we identified some concerns relating to the widespread media coverage of alleged labour exploitation in the Chinese seafood sector and the langoustine fleets working around the coasts of Scotland.

Like many other seafood processors in the UK, we have supply chains in these regions and were extremely concerned about these news stories. We reviewed our supplier base appropriately and put in place additional processes and systems to mitigate any risks to our business.

We continue to work closely with our suppliers around the world and are committed to minimising the risk of exploitation in our broader business network.



Exploitation Prevention Plan

Across these main areas of focus, we have an ongoing prevention plan in which we define, develop and implement practical actions to prevent exploitation and modern-day slavery. These actions work alongside our written statements to ensure that we are doing everything we can to prevent abuses. Our improvements this year include but are not limited to:

- Expanding our SMETA ethical audit standards across our lower classification sites.
- New memberships to key ethical and industry bodies, including the Association of Labour Providers (ALP).
- Developed and completed a human rights due diligence audit across the business.
- Modern-day slavery becoming an agenda item at monthly site board meetings.
- Review of all modern-day slavery training and implementation of new standards.
- Developed a notification system to raise awareness and communicate industry updates.
- Several upgrades of our systematic red warning system that helps to signal potential cases of exploitation or human rights abuse.
- Enhanced engagement with suppliers on matters relating to ethical practice and standards.

We continue to build on our prevention plan every year and take real pride in driving practical improvements across our ethical standards.

Subsidiary Commitment

As part of the Sofina Foods Group, Young's Seafood Ltd is committed to the declarations set out in this statement. We (Young's Seafood Ltd) have a reputation of being a reliable supplier that operates to high standards across animal welfare, social development and ethical practice. We have built this reputation by doing the rights things in the right way. Our commitment to preventing exploitation is no different and we are proud to be part of a Group that takes these things as seriously as we do.

Subsidiary Approval

On behalf of Young's Seafood Ltd, I approved this statement on 29th March 2024

Ty Roberts
Head of HR



Group Commitment

The social and ethical progress we have made across our UK operations is built on an unwavering commitment to prevent exploitation in the network and supply chains in which we operate. This commitment will not falter. We are an upstanding organisation that operates a zero-tolerance policy on exploitation. I am enthusiastic about continuing our work in this area and enriching the working conditions for our colleagues across the Sofina Foods Group.

Group Approval

On behalf of the European operating board of Sofina Foods Ltd, I approved this statement for the subsidiary of Young's Seafood Ltd on 29th March 2024

Michael Latifi
Chairman & Founder

This statement is declared by Young's Seafood Ltd in co-ordination with a number of other subsidiaries of the Sofina Foods Group.