



THREE OCEANS

MODERN SLAVERY STATEMENT

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps that Three Oceans Fish Company Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Three Oceans Fish Company Limited has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

OUR BUSINESS

Three Oceans Fish Company Limited is a dedicated seafood processing plant supplying to customers including Iceland, Waitrose, Morrison's, Quorn and Food Service at sites in Hull, East Yorkshire and Caistor, Lincolnshire. The supply chain extends from the fisherman catching the fish to ingredients and packaging. The organisation currently operates within the United Kingdom (UK) although some of its suppliers are not based in the UK.

Three Oceans Fish Company Limited operates a strict adherence to the Ethical Trading Initiative (ETI) Base Code. This is founded on the conventions of the International Labour Organisation and is an internationally recognised code of labour practice. The company is also a member of SEDEX, the Supplier Ethical Data Exchange which is a not for profit membership organisation dedicated to driving improvements in responsible and ethical practices in global supply chains and monitors adherence of all members against the principles of the ETI Base Code.

OUR HIGH-RISK AREAS

The company believes that none of its activities or those of its suppliers are at high risk of slavery and human trafficking.

OUR POLICIES

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include;

1. **Tackling Hidden Labour Policy.** This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. **Whistleblowing Policy.** We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. **Human Rights Policy.** This policy highlights the organisations stance on human rights for all employees with guidance on how to report an incident or concern.
4. **Ethical Trading Policy.** This policy demonstrates our understanding of business ethics and conduct requirements throughout the organisation

OUR SUPPLIERS

Three Oceans Fish Company Limited operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that organisation has never been convicted of offenses relating to modern slavery and on-site audits which include a review of working conditions. Three Oceans Fish Company Limited also requires that all suppliers are SEDEX registered. Our Tackling Hidden Labour Policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

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In addition to the above, as part of our contract with suppliers, we require that they confirm to us that;

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. (For UK, based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light

TRAINING

Our Procurement and HR Teams have attended Stronger Together training to ensure that they can identify the signs of modern slavery and act if they suspect that it is taking place within our business or our supply chain.

We plan to arrange for all Team Leaders to attend Tackling Modern Slavery courses over the next 12 months.

OUR PERFORMANCE INDICATORS

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if;

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

APPROVAL FOR THIS STATEMENT

Signed for and on behalf of **Three Oceans Fish Company Limited**



Mr Timothy D. Rose

Chief Executive Officer