



Joseph Robertson (Aberdeen) Limited – Modern Slavery Statement

MODERN SLAVERY includes the crimes of human trafficking, slavery and slavery like practices such as servitude, forced labour, forced or servile marriage, the sale and exploitation of children, and debt bondage.

Modern Slavery can occur in every industry or sector and is often linked to other crimes and activities that adversely affect human rights and cause environmental damage, as well as undercutting responsible businesses.

In 2015 an Act of Parliament was introduced along with an Anti-Slavery Commissioner to tackle the growing problem of modern slavery in the United Kingdom. The Global Slavery Index estimates there are currently 3.6million victims of Modern Slavery in Europe and Central Asia.

JOSEPH ROBERSTON COMMITMENT

Joseph Robertson (Aberdeen) Limited (JRL) always treat people in our business and supply chains fairly and with respect.

JRL commit to developing and adopting a risk based and proactive approach to tackle the serious issue of hidden labour exploitation which includes acting ethically and with integrity and transparency in all business dealings, and putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our complex and often remote supply chain.

We are committed to publishing this and future statements on the Modern Slavery Statement Register.

We have developed a series of relevant actions and KPIs linked to our significant ethical and social impacts and the United Nations Sustainable Development Goals (UNSDG) and will report on these annually.

Since the onset of the Covid pandemic in 2020, we have seen travel restrictions, lockdowns and increased working from home. We have also seen price increases across many raw materials partly due to the pandemic, but also wider global supply chain issues and with that, an increase in the risk of modern slavery throughout the world.

OUR BUSINESS

JRL are a family run value added seafood processor, based in Aberdeen who manufacture retailer 'own brand' seafood products.

We employ around 300 personnel covering 9 nationalities, including UK, Polish, Indian and African. All staff are hired on a permanent basis with no temporary, agency or seasonal staff including the majority of cleaning staff.

SCOPE

All work is carried out in-house except laundry, waste management, vending machines supply and maintenance, transport of product, laboratory work and some engineering works. This statement covers internal, supply chain and outsourced activities.

As mentioned above JRL has a wide reaching and complex supply chain making visibility more challenging with direct and in-direct sourcing from 24 countries worldwide, although the vast majority of product is purchased within the UK either direct or through agents.



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Our main ingredient of seafood is both wild caught and farmed. Wild caught is mainly FAO Fishing Area 27 including North, Norwegian and Barents Sea and Iceland fishing grounds with some sourced from FAO 61 and 67 in the Pacific Ocean. Farmed sources are predominantly Scottish with one species sourced from Vietnam.

The map below shows where in the world we source our products from –

Map 1 – Global Supply Chain



GOVERNANCE

At JRL the Finance & Procurement Directors are responsible persons for Modern Slavery within the organisation.

The HR Managers are responsible for day to day management of internal company requirements and the Head of CSR is responsible for supply chain requirements. A new role, CSR Assistant, has been developed and in 2022 will assist the Head of CSR in their duties around Modern Slavery.

Four employees have been identified as Trusted Managers who are responsible for managing any potential Modern Slavery incident in the factory.

Joseph Robertson has publicly committed to the Ethical Trade Initiative Base Code and is audited against this standard, and has recently signed up to the UN Global Compact Ten Principles, principles detailed below.

Ethical Trade Initiative – Ethical Base Code

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The infographic consists of nine numbered items, each with a circular icon above a colored rectangular text box. The items are arranged in three rows of three.

- 1. Employment is freely chosen** (Icon: Two hands shaking)
- 2. Freedom of association and the right to collective bargaining are respected** (Icon: Three people silhouettes)
- 3. Working conditions are safe and hygienic** (Icon: Medical cross)
- 4. Child labour shall not be used** (Icon: Three people silhouettes)
- 5. Living wages are paid** (Icon: Dollar sign)
- 6. Working hours are not excessive** (Icon: Clock face)
- 7. No discrimination is practised** (Icon: Equals sign)
- 8. Regular employment is provided** (Icon: Calendar with 31)
- 9. No harsh or inhumane treatment is allowed** (Icon: Open hand)

United Nations – Global Compact Principles



Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 4: the elimination of all forms of forced and compulsory labour;

Principle 5: the effective abolition of child labour; and

Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Businesses should support a precautionary approach to environmental challenges;

Principle 8: undertake initiatives to promote greater environmental responsibility; and

Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

RISK ASSESSMENT



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Risks can be found within business relationships, our business model, our operating context, public policy decisions leading to weak regulation and workforce characteristics.

People most at risk are those groups already discriminated against for example women, migrants, people with disabilities, young people, unskilled workers, illiterate workers or those who can't speak/read/write the local language and those with mental health issues.

We recognise that certain products and services in certain parts of the world carry a higher risk of child and forced labour and human trafficking and there are various international conventions and protocols that countries can sign up to, to show their commitment to the issue.

Out of the 24 countries we source from –

- 87.5% or 21 countries have signed the ILO Convention CO29 on Forced or Compulsory Labour (1930)
 - 62.5% or 15 countries have signed the ILO Protocol of 2014 to the Forced Labour Convention (1930)
 - 91.7% or 22 countries have signed the ILO Convention C105 on Abolition of Forced Labour Convention (1957)
 - 75% or 18 countries have signed the UN 1926 Slave Convention
 - 100% of countries have signed the ILO Convention C182 on Worst Forms of Child Labour (1999)
 - 100% have signed the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children (2000).
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- 95.8% or 23 countries have signed the Minimum Age Convention C138 (1973)

The following conventions are key to addressing risk factors for forced labour:

- 83.3% or 20 countries have signed C87 - Freedom of Association and Protection of the Right to Organise Convention, 1948
- 91.7% or 22 countries have signed C98 - Right to Organise and Collective Bargaining Convention, 1949 (only China and the United States of America have not signed)
- 95.8% or 23 countries have signed C100 – Equal Remuneration Convention, 1951 (only the United States of America has not signed)
- 91.7% or 22 countries have signed C111 – Discrimination (Employment and Occupation) Convention, 1958 (only Malaysia and the United States of America have not signed)
- 54.2% or 13 countries have signed C187 – Promotional Framework for Occupational Safety and Health Convention, 2006
- 41.7% or 10 countries have signed C155 – Occupational Safety and Health Convention, 1981
- 12.5% or 3 countries have signed C190 – Violence and Harassment Convention, 2019

Regular unannounced ethical audits on processing plants in Asia, semi-announced audits on processing plants in Europe and announced audits on UK based processors are in place. In 2020 and again in 2021 we reviewed and updated our Ethical Sourcing Policy clarifying and increasing expectations of suppliers further down our supply chain and identifying additional measures that will be developed into a supplier action plan.

Our Supplier Ethical Risk Assessment breaks down suppliers into categories of how much influence we have over them, from Low, Medium and High. The more leverage or influence we have the more chance we have to make positive changes. From our 46 preferred suppliers 24 are low leverage, 15



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medium and only 7 high. In spending terms, we spend around 65% of our total spend on the 5 high leverage suppliers. Low leverage is due to us having less reliance on them and/or only purchasing small volumes.

In late 2020 we introduced a Modern Slavery commitment to our New Supplier Form, that all suppliers complete at time of contract, with regular updates requested to ensure details correct and to reaffirm their commitment. A majority of suppliers have now completed and returned this to the Purchasing Department. We also expect all our suppliers to complete the SEDEX Supplier Approval Questionnaire or if they are not members then our internal JR202 Ethical Supplier Questionnaire. The responses are reviewed against our ethical criteria, prior to the supplier being approved. Areas of concern are highlighted to the Procurement department or direct with supplier, and further information/clarification is requested. If the supplier does not meet our ethical trade standards, we can work with them to improve, but if improvement is not forthcoming, we may make the decision to stop sourcing from this supplier. Each supplier is reviewed on a case-by-case basis dependant on the product, source country and vulnerability of the product within JRL.

SEDEX have developed a Vessel Questionnaire which can be completed by vessel skippers or owners, free of charge, without having to be a member. Both of our UK seafood suppliers have been made aware of this.

An identified risk in the supply chain is for Illegal, unreported and unregulated (IUU) fishing. To counteract that risk we ensure the majority our seafood is certified for sustainability which includes a review of labour rights and treatment of employees. The remainder is within a Fishery Improvement Programmes which focuses on improving sustainability of the source but also has a social element. We also request a list of vessels and their IMO numbers from our direct suppliers and have them confirm that vessels are checked against IUU blacklists regularly.

POLICY IMPLEMENTATION

All policies and procedures are reviewed, approved and signed off at Director/Board level

Policies are implemented by relevant staff being informed, staff asked to read and confirm that they have understood the document, and any changes to the policy are tracked and new versions reissued to staff.

INTERNAL POLICIES & PROCEDURES

- During our recruitment process, candidates are subject to specific questions, based on the Stronger Together checklist, that can give an indication if they have been trafficked and forced to work against their will.
- Eligibility to work in UK checks are also completed for every new employee.
- JRL does not utilise temporary labour and only employs permanent staff, which reduces risk exponentially.
- Posters and leaflets on Modern Slavery have been distributed throughout the organisation.
- Modern Slavery is covered within inductions using a Stronger Together awareness video
- Whistleblowing procedures are in place for the company and our customers to report any concerns.
- JRL is fully compliant with the ETI Base Code which is aimed at protecting human rights of workers in our supply chain.



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- From 2021 we will be audited against the standard every 3 years via a SMETA audit and have committed to undergo a 4 pillar audit which includes additional elements on Environmental Management and Business Ethics.
- Due to COVID our SMETA audit due in 2020 but was postponed and rescheduled for 2022.
- Compliant with all customer Ethical Trade and Human Rights Codes of Practice and review our processes in line with those and industry best practice
- A Prevention, Identification & Remediation of Modern Slavery procedure has been developed including reference to the Modern Slavery helpline for management
- If Modern Slavery is identified within our business we will remediate the situation, in line with the wishes of the victims, including access to training and compensation.

SUPPLY CHAIN POLICIES & PROCEDURES

Our policy and procedure for ethical sourcing of raw materials is continually reviewed to ensure best practice and to extend requirements further into the supply chain. Currently it includes –

- All suppliers must commit to identifying and preventing modern slavery with a commitment in the New Supplier Form
- All suppliers are requested to join SEDEX and all suppliers are risk assessed against environmental, human rights and ethical trade practices
- Preferred Suppliers are expected to be members of SEDEX and also undergo a SMETA (SEDEX Members Ethical Trade Audit) at different timeframes dependant on risk.
- Detailed action plans for high-risk suppliers or those with limited evidence of ethical engagement

We support the following certification schemes - Marine Stewardship Council (MSC) for wild caught seafood, Global Gap, Best Aquaculture Practices (BAP) & Aquaculture Stewardship Council (ASC) for farmed sources certification schemes which include assessment of ethical treatment of workers.

We also support the Seafish Responsible Fishing Vessel Scheme (RFVS) as a means to have ethical oversight at vessel level, and we are working with suppliers on gaining this or other alternative ethical standard certifications such as RISE or in-country schemes such as in Norway and Iceland.

Procurement practices can add to the risk of Modern Slavery. We ensure good working relationships with suppliers and negotiate price along with other factors including health and safety, human rights and ethics. This ensures we do not put undue pressure on suppliers and ensure prices paid are sufficient for decent wages to be paid and safe working conditions found in the work place. The Procurement Department were invited to a Modern Slavery workshop in Q1 2020 to explain the issues faced by suppliers due to procurement practices and identify any negative purchasing practices within JRL with the aim of reducing the risk of modern slavery from purchasing decisions. An action plan was created after this workshop and the CSR and Procurement teams are working on these improvements.

The JRL Sales team also received basic awareness training in 2021 on what Modern Slavery is, how we are managing it within JR and our plans for managing it within the supply chain.

If Modern Slavery is identified within our supply chain, we will work with suppliers to remediate the situation, working in line with the wishes of the victims, including access to training and compensation..

CAPACITY BUILDING IN THE SUPPLY CHAIN

We recognise the challenge of ensuring full visibility within the supply chain and are aware of the reluctance of some suppliers further down the supply chain to undertake additional due diligence at the



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request of a customer many steps removed. We will continue to work with our direct suppliers on an approach to these challenges.

The Risk Assessment process has also identified areas where we have little or no leverage with the supply chain e.g. vessels due to their remote working and being 3-4 steps down our supply chain, and our indirect Tier 2 and 3 suppliers. Currently we have access to the names and locations of these suppliers but we have no direct contact with them so capacity building will likely involve only our Tier 1 suppliers, with an expectation on them to cascade capacity through their own supply chain.

In 2020 JRL assessed all suppliers against the risks of recruitment fees and developed specific supplier questionnaires to question what due diligence is in place to prevent fees being paid by their employees and in their supply chain. The response from suppliers was mixed, with some confirming they don't use labour providers or agency staff which reduces their risk dramatically, others responded fully with what due diligence they had in place. The number of responses is detailed below in KPIs.

The next steps on Recruitment Fees are to work directly with 5 strategic suppliers (a mix of seafood and other raw materials suppliers) and develop a workshop to highlight the issue and then carry out a deep dive into their recruitment policies, procedures to identify risks of recruitment fees and then carry out worker interviews to identify if recruitment fees have been paid, and if discovered, we will work with suppliers to remediate the situation.

OUTSOURCED SERVICES POLICIES & PROCEDURES

Outsourcing is a way for specialist activities to be managed by a 3rd party on our behalf. Our current procedure for outsourced services is for all contractors to complete the New Supplier form including a commitment to prevent, identify and remediate any modern slavery within their business and supply chain and to provide their Modern Slavery statement and any ethical sourcing/purchasing procedures/policies. All 3rd party contractors were asked to sign the New Supplier Form in 2021, responses detailed below in KPIs. Examples of our outsourced services are -

Laundry – provides factory coat cleaning and sanitary services

Transport – provides all our logistics for product from factory to depot

Engineering – ad hoc engineering projects

Waste Management – 4 contractors covering recyclables, food, fish and confidential

Laboratories – used for sample testing

Caterers – provide vending and water machines

Cleaning – one part time cleaning staff hired through an agency

INDUCTION & TRAINING

All JRL staff and supply chain partners need to be engaged to help us tackle Modern Slavery and be able to recognise the signs and what to do if they see anything that concerns them.

This engagement begins on an employees' first day with Modern Slavery being covered at inductions with a short presentation and the Stronger2gether video. All new employees receive training on the Ethical Trading Initiative and its base code as well as the whistleblowing procedures for our company and customers.



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The Head of CSR has received training from Stronger Together on identifying modern slavery in UK businesses and global supply chains.

Four trusted Managers will receive training in 2022 from Stronger Together on identifying Modern Slavery in UK businesses and further internal training on how to manage a potential Modern Slavery situation in the factory ensuring workers are protected from further victimisation, punishment or retaliation.

JRL is also committed in 2022 to training additional key staff in conjunction with Stronger Together which demonstrates what we can do to monitor, detect, protect and aid any colleague who may be at risk of, or already linked to modern slavery or forced labour, focusing on team leader level.

COLLABORATION & PARTNERSHIP

At JRL we collaborate and partner with various organisations on this issue –

Food Network for Ethical Trade (FNET) is a collaborative initiative aiming to use the collective leverage of suppliers and retailers to bring about positive change in working conditions in global food, beverage and horticulture supply chains by providing guidance, resources, training and opportunities for collaboration. JRL are involved in the Risk Assessment, Supplier Engagement and Recruitment Fees Workstreams. Head of CSR regularly attends FNET all member meetings and working group sessions.

Seafish Ethical Common Language Group (ECLG) is a collective response to growing concerns regarding unethical practices within the global seafood market. The aim of the group is to establish a common understanding of ethical issues within the seafood industry, communicate measures taken to address them, and agree a clear agenda for future action. Head of CSR regularly attends ECLG meetings.

The Seafood Ethics Action Alliance (SEAA) has been established by the seafood industry to provide a platform for collective engagement, to share information on emerging issues, agree best practice solutions, and provide a forum for collective pre-competitive action where it is not better fulfilled by an existing organisation. The SEA Alliance co-ordinates pre-competitive ethics work for the UK seafood industry and addresses key ethical issues in shared supply chains. Head of CSR regularly attends SEAA meetings.

We support the *Responsible Fishing Vessel Scheme (RFVS)* which has been developed to raise standards in the catching sector, enabling those within the seafood supply chain to demonstrate their commitment to the responsible sourcing of seafood. The RFVS is the only global standard that audits compliance on board fishing vessels, including ethical and welfare criteria.

Customer specific Ethical Trade Forums are held annually and give JRL an detailed insight into the aims and objectives of retailers as well as insight into what other industry members are doing to meet and exceed customer ethical trade policies

Stronger Together is a multi-stakeholder organisation aimed at reducing Modern Slavery in particular forced labour, labour trafficking and other hidden third-party exploitation of workers. They provide guidance and training to employers, workers and labour agencies. JRL uses the tools and resources available to help develop this statement. JRL became business partners to Stronger2gether in 2020.



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JRL follow the *ETI* base code internally and expect our Preferred Suppliers to do the same. The code is founded on the conventions of the International Labour Organisation (ILO) and is an internationally recognised code of good labour practice.

JRL use products certified by a range of certification bodies, specifically, Aquaculture Stewardship Council, Global Gap, Best Aquacultural Practice (BAP), Roundtable for Sustainable Palm Oil (RSPO), Responsible Fishing Vessel Scheme (RFVS) and Marine Stewardship Council (MSC), all have introduced social/labour elements in their certification scheme.

MONITORING & KPIs

We have linked our KPIs to the UN Sustainable Development Goals –

8.7 Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms

16.2 end abuse, exploitation, trafficking and all forms of violence and torture against children

KPIs can be quantitative, qualitative, leading, lagging or process and can focus on input, output, outcome or impact, but all must be SMART. Our KPIs for 2019/2020 were -

- Number and percentage of personnel trained: 1 / 0.4% - 2020 aim 10 or 4%
- Number of WB calls in 2019 - zero - 2020 aim to review system
- Number and percentage of suppliers signed off on MS commitment – TBC – all new suppliers will sign, process of asking current suppliers to sign
- Number of SMETA NCs 'employment is freely chosen' – 3 NCs across all suppliers from 160 NCs (1.8%)
- Number of internal SMETA NCs 'employment is freely chosen' and other labour issues
 - 3 of 9 NCs at last audit 2016 focused on labour – wages/benefits, working hours and entitlement to work, all verified at the follow up audit in 2016
 - Periodic audit due February 2020

The table below shows the KPIs set in 2019 and their results through to 2021KPI	2019 (Result)	2020 (Aim)	2020 (Result)	2021 (Aim)	2021 (Result)
Personnel Trained	1	10	1	10	6
% Personnel Trained	0.4%	4	0.4%	4	2%
WB Calls	0	use if required	1	use if required	0
Tier 1 Suppliers/contractors Signed MS Commitment	0	n/a	1	c30	32
% Tier 1 Suppliers/contractors Signed MS Commitment	0	n/a	1.2%	80%	37.6%
Supplier SMETA NCs 'employment is freely chosen'	3	0	2 (from 1 supplier)	0	6 (from 3 suppliers)
Internal SMETA NCs	0	0	0 (no audits)	0	0 (no audits)



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New KPIs for 2022

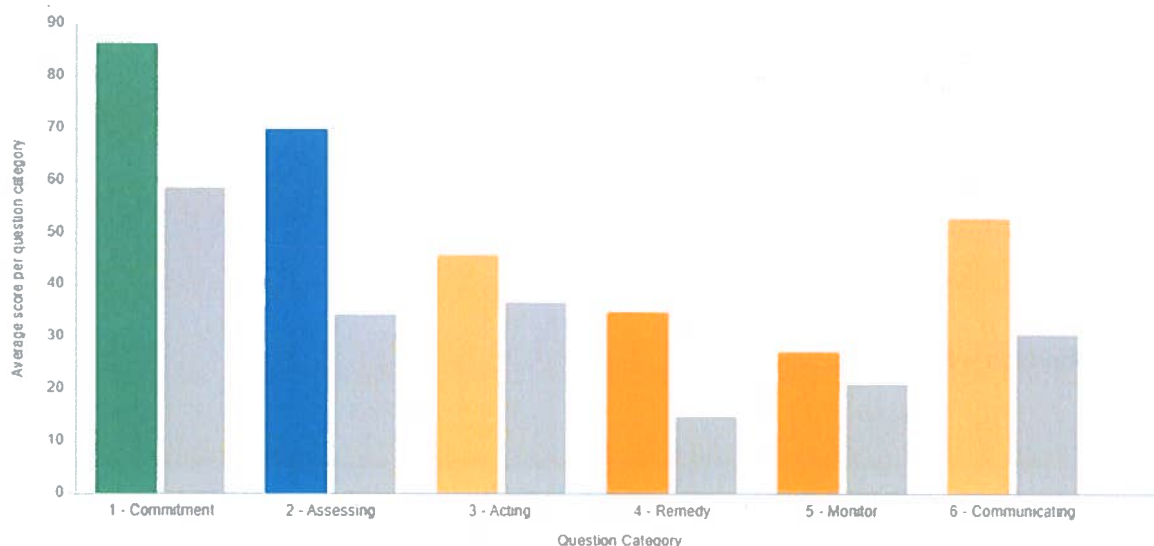
KPI	2021 (Result)	2022 (Aim)	2022 (Result)
Number of suppliers responded re Recruitment Fees (40 contacted)	25	40	Tbc
JR PRT Sections with Full marks	22	25	Tbc

The Stronger Together Reporting Tool is also used to gauge progress and carried out annually by the Head of CSR. This gives us a benchmark against competitors and highlights improvement opportunities. In 2018 we scored full marks in 8 questions (10%), scored above average in 24 questions (30%) and below average or unanswered/N/A in 47 questions (60%).

The tool was updated November 2020 with an overall score of 49%. We scored high for Commitment showing Good Progress. Assessing, Acting and Communicating categories are marked as 'getting there' and only Monitor and Remedy are areas where more work is needed. We scored full marks in 20 questions or 28% (up from 8 / 10% in 2018), scored above average scores in 52 questions or 72% (up from 24 / 30% in 2018) and below average or unanswered/N/A in 24 questions or 30% (down from 47 / 60% in 2018).

The tool was updated again in November 2021 with an overall score of 54% (up from 49% in 2020).

Graph 1 – Progress Reporting Tool Comparison with others in programme



Legend: green = achieving: blue = good progress: yellow = getting there: orange = more work needed

It is clear that we are achieving above average scores in all sections but scoring more than double than average on Assessing and Remedy, with positive scores on all other sections.

ACTIONS FOR 2021 - Progress



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- Train Trusted Managers through Stronger Together – postponed due to COVID, carried over from 2020/21, carry over to 2022
- Develop employee survey on MS awareness – delayed as require training in place before survey can be released to staff, carried over from 2020/21, carry over to 2022
- Review the Employee Voice and Whistleblowing system for adequacy — delayed due to staff changes, carried over from 2020/21, carry over to 2022
- Review supply chain for recruitment fees and develop action plan to remove – Individual emails sent to 40 key suppliers asking for information on their due diligence on recruitment fees, 25 suppliers responding with 19 of those stating no use of Labour Providers or Agency Workers which reduces risk. The 6 suppliers who do use either labour providers or agency workers provided details of their due diligence.

ACTIONS FOR 2022

- Carry over actions above
- Recruitment Fees - focus on a few key suppliers who want to engage on this issue and implement a deep dive into their supply chains.

STATEMENT APPROVAL

The Company Directors and senior management shall take responsibility for implementing this policy statement and its objectives, and will ensure adequate resources and investment to safeguard the statement.

This statement was approved by the Board of Directors

Signed.....

Date.....7/1/22

Michael Robertson – Managing Director