



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 United Nations and the Walk Free Foundation estimate there are 40million victims of Modern Slavery worldwide currently.

JOSEPH ROBERSTON COMMITMENT

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

JRL commit to developing and adopting a risk based, zero tolerance 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 have developed a series of relevant actions and KPIs linked to the United Nations Sustainable Development Goals (UNSDG) and will report on these annually.

OUR BUSINESS

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

We employ around 250 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 policy 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 22 countries worldwide, although the vast majority of product is purchased within the UK either direct or through agents.

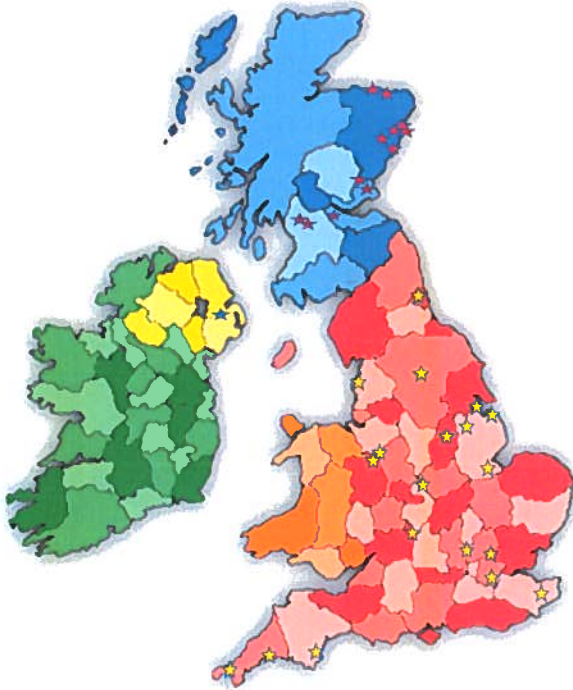
Our main ingredient of seafood is both wild caught and farmed. Wild caught is mainly FAO Fishing Area 27 including North, Norwegian and Barents Sea and Iceland fishing grounds with some sourced from FAO 61 and 67 in the Pacific Ocean. Farmed sources are mainly UK and Norway with one species sourced from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

The maps below show where we source our products from –

Joseph Robertson (Aberdeen) Limited – Modern Slavery Statement



Map 1 – UK Supply Chain



Map 2 – Global Supply Chain



GOVERNANCE

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



Joseph Robertson (Aberdeen) Limited – Modern Slavery Statement

The Senior HR Manager is responsible for managing internal company requirements and the CSR Manager is responsible for supply chain requirements. A newly employed CSR Assistant is also now involved in assisting CSR Manager 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.

RISK ASSESSMENT

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.

Out of the 23 countries we source from –

- 21 have signed the ILO Convention 29 on Forced or Compulsory Labour (1930)
- 21 have signed the ILO Convention 105 on Abolition of Forced Labour Convention, 1957
- 16 have signed the UN 1926 Slave Convention
- 100% of countries have signed the ILO Convention 182 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).

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 we reviewed and updated our Ethical Sourcing Policy clarifying expectations of suppliers and identifying further 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 30 preferred suppliers 14 are low leverage, 11 medium and only 5 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 only purchasing small volumes.

We expect all our suppliers to complete the SEDEX Supplier Approval Questionnaire or if they are not members then our internal Supplier Approval Questionnaire. The responses are reviewed against our purchasing 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 JR.

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. We will work with SEDEX and our suppliers to increase uptake of this questionnaire within our supply chain.



Joseph Robertson (Aberdeen) Limited – Modern Slavery Statement

An identified risk in the supply chain is for Illegal, unreported and unregulated fishing. To counteract that risk we ensure all our seafood is certified for sustainability which includes a review of labour rights and treatment of employees. We also request a list of vessels and their IMO numbers from our direct suppliers and have them confirm that vessels are checked against 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 sign 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.
- 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. We are audited against the standard every 3 years via a SMETA audit and have committed to a 4 pillar audit which includes an additional element on Business Ethics in 2020.
- Compliant with all customer Ethical Codes of Practice and review our processes in line with best practice
- 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

We have recently updated our Ethical Sourcing Policy to include –

- All suppliers must commit to identifying and preventing modern slavery with a commitment in the New Supplier Form
- All suppliers are invited to join SEDEX and all suppliers are risk assessed against 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)
- Detailed action plans for high-risk suppliers or those with limited evidence of ethical engagement



Joseph Robertson (Aberdeen) Limited – Modern Slavery Statement

We support the Seafish Responsible Fishing Vessel Scheme (RFVS), Global Gap, Best Aquaculture Practices (BAP) & Aquaculture Stewardship Council (ASC) certification schemes which include assessment of ethical treatment of workers, and sourcing from certified vessels and farms where possible.

Procurement practices can add to the risk of Modern Slavery. We ensure good working relationship 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 will be invited to a Modern Slavery workshop in 2020 to identify negative purchasing practices with the aim of reducing the risk of modern slavery from purchasing decisions.

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.

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 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 suppliers Tier 2 and 3 suppliers. Currently we have access to the names and addresses 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.

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. 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



Joseph Robertson (Aberdeen) Limited – Modern Slavery Statement

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.

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

Trusted Managers will receive training in 2021 from Stronger Together on identifying Modern Slavery in UK businesses and further 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 committed in 2021 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.

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.

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.

We support the Responsible Fishing Vessel Scheme 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 RFS 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 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 and we commit to becoming a business partner to Stronger2gether by Q1 2020.



Joseph Robertson (Aberdeen) Limited – Modern Slavery Statement

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 Sustainability Certification bodies, specifically, Aquaculture Stewardship Council, Global Gap, RSPO and Marine Stewardship Council, 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 are -

- 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

Monitoring the effectiveness of KPIs is difficult so we will review the outcomes of these KPIs at the end of 2020 and develop a process for monitoring effectiveness in 2021.

The Stronger Together Reporting Tool is also used to gauge progress and carried out every 2 years by the Procurement, Finance and Technical Directors. 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)

KPI	2019 (Result)	2020 (Aim)	2020 (Result)	2021 (Aim)
Personnel Trained	1	10	1	10
% Personnel Trained	0.4	4	0.4	4
WB Calls	0	use if required	1	use if required
Suppliers Signed MS Commitment	0	n/a		c30



Joseph Robertson (Aberdeen) Limited – Modern Slavery Statement

% Suppliers Signed MS Commitment	0	n/a		80%
SMETA NCs 'employment is freely chosen'	3	0	2	0
Internal SMETA NCs	0	0	0 (no audits)	0

ACTIONS FOR 2021

- Train Trusted Managers through Stronger Together – carried over from 2020
- Develop employee survey on MS awareness – carried over from 2020
- Review the Employee Voice and Whistleblowing system for adequacy – ask staff via a survey to raise awareness – carried over from 2020
- Review supply chain for recruitment fees and develop action plan to remove - ongoing from 2020

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.....

Michael Robertson – Managing Director