



This statement is in accordance with the Modern Slavery Act 2015.

It sets out steps taken by Labeyrie Fine Foods UK to prevent modern slavery and human trafficking in its business and associated supply chains during its financial year ending 30th June 2019.

Introduction

Labeyrie Fine Foods UK (LFF UK) welcomes the Modern Slavery Act and the duty it places on businesses to disclose publicly the steps they are taking to tackle forced labour and human trafficking.

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour. We are committed to acting 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 chains.

LFF UK acknowledges the provisions of the Modern Slavery Act 2015. We are publishing this report to share our strategy and fulfil the reporting requirements set out in the Modern Slavery Act.

The scope of this statement covers all LFF UK sites namely Farne Salmon and Trout Ltd and Lyons Seafoods Ltd. It sets out our approach, actions, and programmes to prevent modern slavery and human slavery in our business units and supply chains.

Our organisation's structure, its business and supply chains

Labeyrie Fine Foods was founded in the southwestern France in 1946 and has always endeavoured to engage the best partners for shared moments of enjoyment

<http://www.labeyrie-fine-foods.com/en/group/>

LYONS SEAFOODS



Farne
of
Scotland

With a joint sales turnover of £230m both LFF UK sites Farne Salmon and Trout Ltd and Lyons Seafoods Ltd were acquired by Labeyrie Fine Foods in 2004.

We are a Speciality UK Private Label Seafood Business and employ 1,000 staff across both sites with a very diverse and global supply chain.



Our policies

Our Supply chains

As a responsible organisation and member of FNET (Food Network of Ethical Trade), we take very seriously the working conditions of any personnel involved in the production of our products.

To ensure that working conditions meet our aims and objectives we have implemented a Code of Business Conduct and Ethics & a Responsible Sourcing Policy which have been approved by our Executive Committee (ComEx).

Both documents address the responsible sourcing standards that we expect to be applied across all our suppliers.



We build long term partnerships with all our suppliers who share our values and who are prepared to commit themselves to our Socially Responsible Policy and ethics code of conduct which is consistent with internationally agreed UN conventions on workers 'rights and the Ethical Trading Initiative (ETI) base code.

Our UK Processing Sites

Internally we have a dedicated human resource team that has established systems to enable whistle blowing as well as prevent hidden labour exploitation.

Our employment policies include the following:

Bullying and harassment Policy

Sick pay policy

Equal opportunities policy

Whistleblowing

Disciplinary Grievance procedure

Code of Conduct

Our Due Diligence Processes

Our Supply chains

Over the past couple of years, we have focused our efforts on improving transparency at all levels of our supply chains. We are an AB member of SEDEX, an on-line platform that enables us to manage labour rights, health & safety, the environment and business ethics' performance of our suppliers.

We use a risk assessment developed by the Food Network for Ethical Trade (FNET), a body made up of retailers and suppliers working to tackle supply chain human rights risks. This is carried out at the country level and rates countries from high to low risk.

A valid ethical audit (less than 18 months old) must be shared via the Sedex system for all first-tier productions sites operating in high-risk countries. We use a combination of third-party audit and supplier visits to verify this information. Estelle Brennan, Head of Sustainability LFF UK is a trained ethical trading SA8000 Lead Auditor.

Our UK Processing Sites

We have a positive approach with regards to worker training, development and good people relations and use the many resources available on Stronger Together.



All members of the HR team have taken part in the Stronger Together and Gangmaster Labour Abuse Authority (GLAA) workshops.

Our 2 UK sites undergo regular SMETA audits.

In addition, we ensure that any temporary labour providers we use have a current GLAA License by checking the Public register as adhering to the guidelines set by them.

<http://laws.gla.gov.uk/Default.aspx?Menu=Menu&Module=PublicRegister>

Identified risks

Overfishing and demand for illegal fish leads to demand for illegal, unregulated and unreported (IUU) fishing known to be linked with labour exploitation. There are well known reported instances in the seafood industry of forced and trafficked labour.

Modern Slavery involves criminal activity and the signs can often be very subtle and difficult to identify, so audits can only get us so far.

In countries undergoing socio-political stress such as Thailand, we require additional due diligence measures.

For example, as a strategic partner of the Issara programme we expect all our prawn suppliers from Thailand to engage in the Issara Institute programme

<https://www.issarainstitute.org/>.

Systemic labour right issues often require broader collaboration with other businesses, civil societies or other stakeholders and that is why we participate in initiatives such as the Seafood Taskforce <https://www.seafoodtaskforce.global/>

Awareness and collaboration

We engage with numerous CSR stakeholders to support us in the implementation of our sustainability policies, advocating with governmental bodies in region where seafood management and human rights legal framework need to be strengthened:

- 1) We are a member of the Seafood Industry Alliance (SIA) a compelling voice at national and international level to meet the full range of challenges in providing consumers with secure, nutritious and sustainable fishery products at a time of unprecedented uncertainty and change



- 2) Working together with Seafish we have created and chair (since 2014) the Ethics Common language group, a collective response to growing concerns regarding unethical practices within the global seafood market.
- 3) Strategic partnership with the Issara Institute- an independent NGO based in Southeast Asia tackling issues of trafficking and forced labour through data, technology, partnership, and innovation. The Institute was established in 2014 by a team of anti-trafficking experts coming out of the United Nations who created an alliance of private sector, civil society, and government partners to address labour issues in global supply chains. <https://www.issarainstitute.org/issara-strategic-partners>
- 4) Membership of the Seafood Taskforce, a group of seafood processors, feed producers, buyers, retailers, government representatives and NGOs who have come together to address issues surrounding labour and illegal fishing in seafood supply chains currently focusing on the seas around Thailand. <https://www.seafoodtaskforce.global/>
- 5) Membership of The Food Network for Ethical Trade (FNET) - expert support in developing suppliers' ethical trade strategies and opportunities to collaborate with other suppliers and retailers in mitigating ethical trade risks. Its key mission is to improve human rights in global food supply chains through a common approach to managing ethical trade. <https://foodnetworkforethicaltrade.com/>



6) Representation on:

- IFFO RS Governing Body Committee <https://www.iffors.com/iffors-governing-body-composition>
- Standards Oversight Committee of the Global Aquaculture Alliance <https://bapcertification.org/Standards>
- RFS (responsible fishing scheme) Technical Advisory Committee (TAC) and the RFS V2 Crew Welfare TAC. <https://www.seafish.org/article/supply-chain-support-for-the-rfs>
- Global Dialogue on Seafood Traceability, an international, business-to-business platform established to advance a unified framework for interoperable seafood traceability practices. The Dialogue brings together a broad spectrum of seafood industry stakeholders from across different parts of the supply chain, as well as relevant civil society experts from diverse regions.





Effectiveness & our next steps

During the past 12 months (June 18 / June 19)- LFF UK did not identify instances of modern slavery in its supply chain.

Moving forward we will be building on the activities and progress we made in 2018/19 and focus our efforts on ethical recruitment by mapping the use of recruitment tools and reviewing all our processes and procedures.

This policy statement will be reviewed and published annually.

Mark Newton

Managing Director, Labeyrie Fine Foods UK

July 5th, 2019

