
Modern Slavery Statement

LABEYRIE | UNITED KINGDOM
FINE FOODS

For the financial year ended
30 June 2023 (FY22/23)

LET'S ALL BE

Responsible food
enthusiasts

Farne
of Scotland

LYONS SEAFOODS



Modern Slavery Act
2015

CHAPTER 30

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Introduction

Modern Slavery encompasses slavery, servitude, human trafficking and forced labour.

Labeyrie Fine Foods UK (LFF UK) part of Labeyrie Fine Foods (LFF) 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.

The scope of this statement covers all Labeyrie Fine Foods' UK sites namely Farne Salmon and Trout Ltd (Duns) and Lyons Seafoods Ltd (Warminster)

This statement is published in accordance with **the Modern Slavery Act 2015**. It sets out the 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 June 2023. It details our approach, actions, and programmes to prevent modern slavery and human slavery in our business units and supply chains.

This statement has been reviewed and approved by the UK Board of Directors.

Date: 10th July 2023

Signed:



Mark Newton
Managing Director LFF UK



Linda Dickson
UK HR Director

1. Our Business

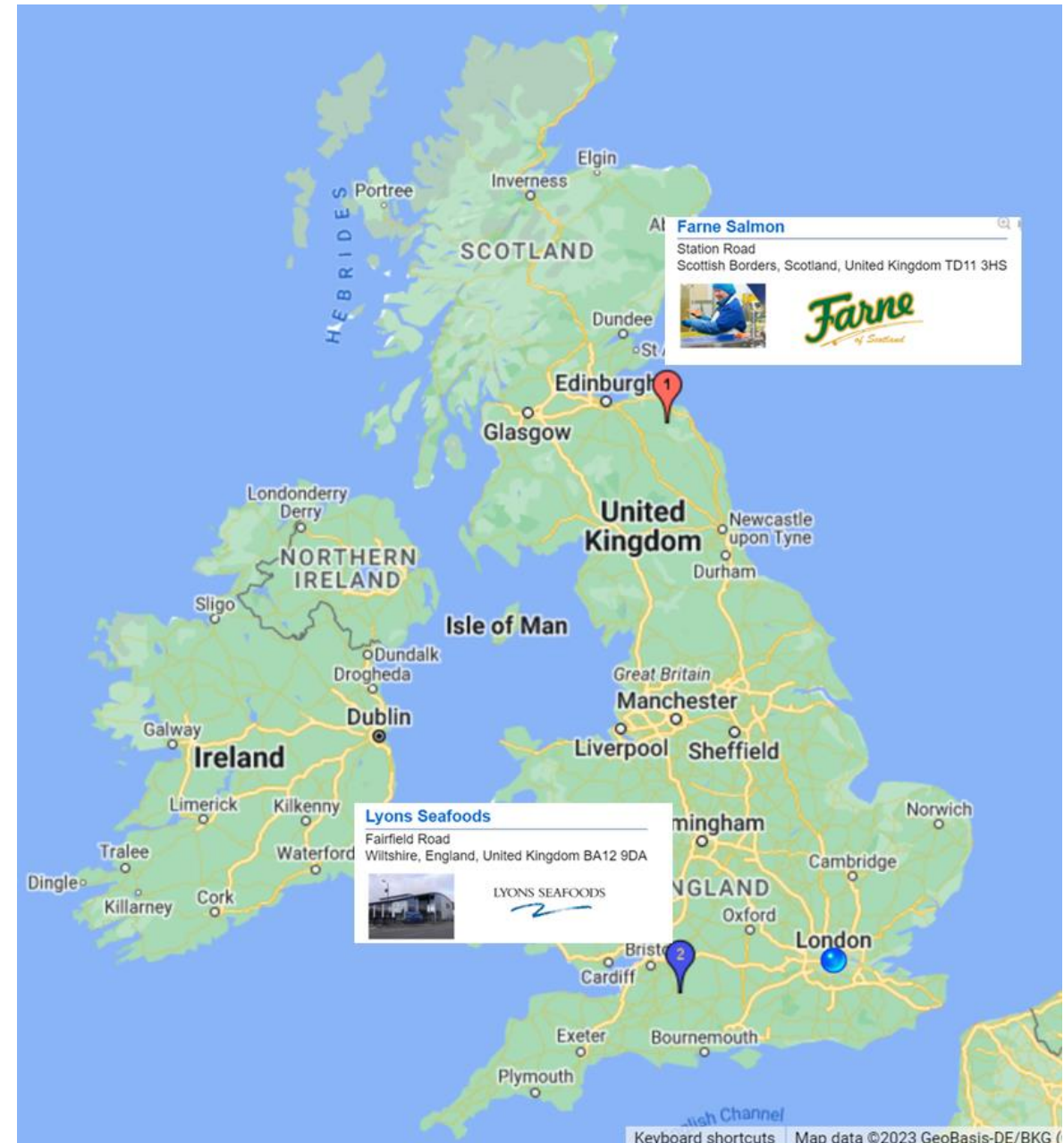
Labeyrie Fine Foods UK is the UK leading speciality private label seafood business. Our product range includes farmed salmon, farmed tropical prawns and a variety of wild seafood such as northern shrimp, mussels, scallops, squid, and crayfish.

Farne started production in 1982 with a workforce of just six people. Today, we are the largest private sector employer in the Borders with a workforce of over 600 people.

Lyons Seafoods started production in 1958, and has undergone significant transformation over the past 50 years. Lyons Seafoods is Warminster's largest private employer providing in excess of 250 jobs in the town and surrounding areas.

With a joint sales turnover of £230m, these two sites were acquired by Labeyrie Fine Foods Group in 2004.

[Home - Labeyrie Fine Foods \(labeyrie-fine-foods.com\)](http://labeyrie-fine-foods.com)



2. LFF UK : Our People

Number of Employees: 852

% of Male workers: 65

% of Female workers: 35

% Permanent Employees: 99.5

% Agency Workers: 0.5

% Young Workers: 0.4

% UK Nationals: 55.5

% Non UK Nationals: 44.5

 <p>Employment is freely chosen</p> <p>Slavery and bonded labour are totally unacceptable. Almost 21 million people are victims of forced labour.</p>	 <p>Freedom of association and the right to collective bargaining are respected</p> <p>Tens of thousands of workers lose their jobs every year for attempting to form or join a trade union or improve working conditions. Some even lose their lives.</p>	 <p>Working conditions are safe and hygienic</p> <p>An estimated 2.3 million people die every year from work-related accidents and diseases.</p>
 <p>Child labour shall not be used</p> <p>168 million children work to support their families, missing out on education and often damaging their health. This reinforces the cycle of poverty.</p>	 <p>Living wages are paid</p> <p>Roughly half the world's population still lives on two dollars a day. If people can't feed their families on an adult's wage, they may send their children to work.</p>	 <p>Working hours are not excessive</p> <p>Long working hours are the norm for most of the world's workers. This damages people's health and undermines family life.</p>
 <p>No discrimination is practised</p> <p>Women and certain minorities are often confined to the lowest-paid jobs with no access to training or promotion.</p>	 <p>Regular employment is provided</p> <p>Most workers can be laid off when it suits the employer. This fuels poverty and insecurity and drives down wages.</p>	 <p>No harsh or inhumane treatment is allowed</p> <p>Few workers have protection against physical, verbal or sexual abuse in the workplace.</p>



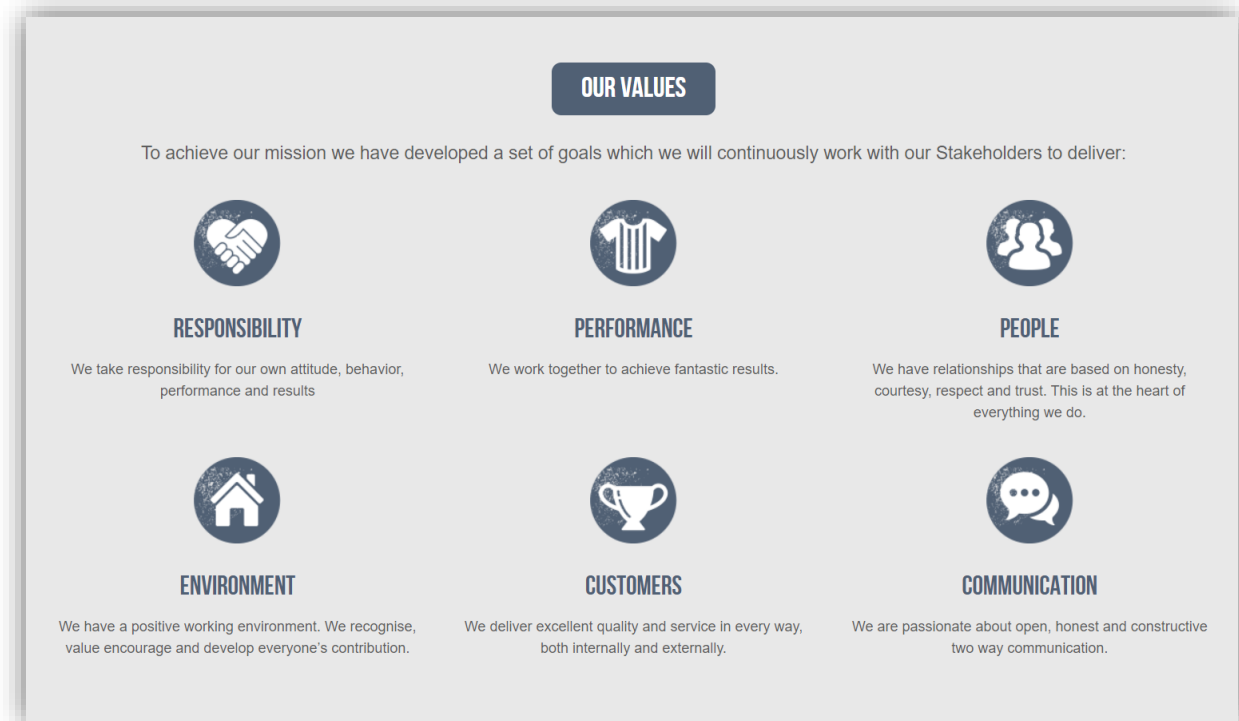
3. Our Values & Governance

At Labeyrie Fine Foods we recognise that there are various environmental & ecological impacts associated with seafood production. These issues not only affect the overall sustainability of the target species, but also that of the wider ecosystem.

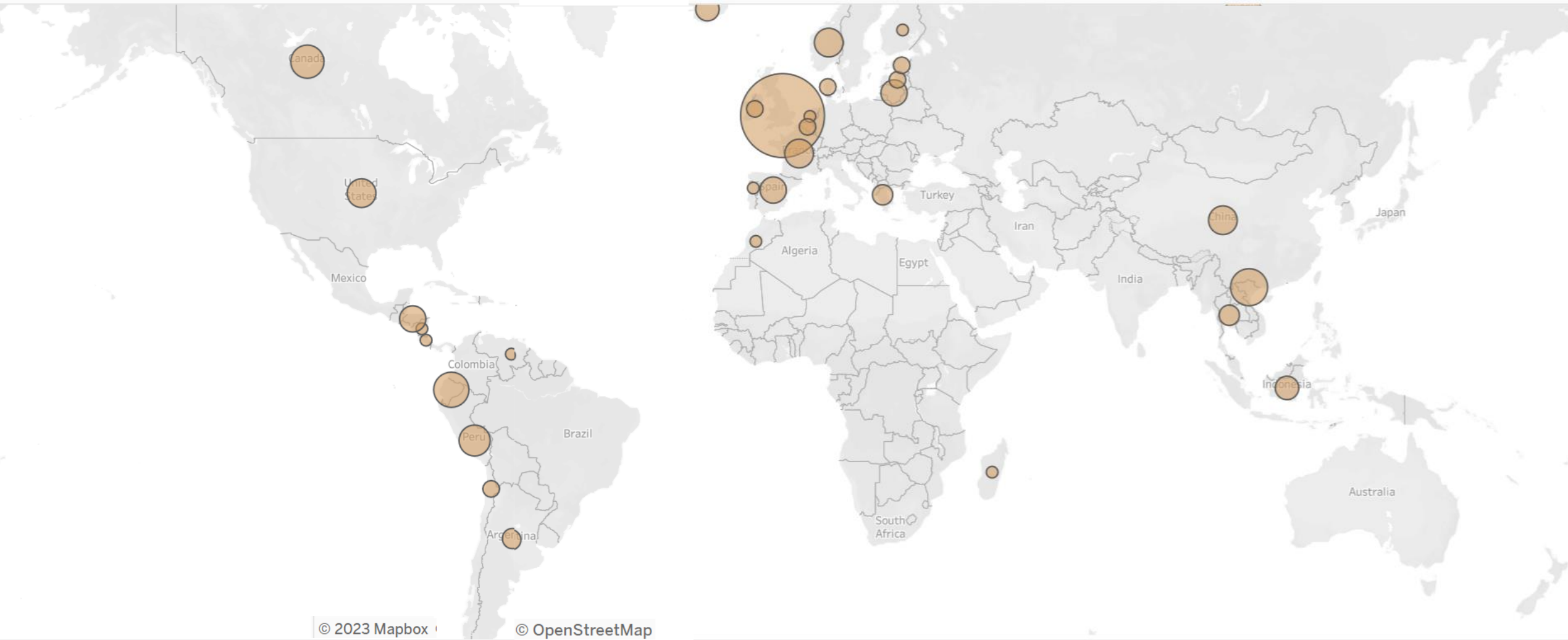
We fully support the United Nations Guiding Principles on Human Rights and Labeyrie Fine Foods has reaffirmed this commitment through its membership of UN Global Compact.

LFF UK overall CSR strategy is overseen by Mark Newton, Managing Director, LFF UK.

The Head of Sustainability reports directly into the Managing Director and leads a specialist team that defines and implements action plans tailored to our individual customer needs and vision, and in line with our group's overall strategy (as detailed in our CSR Report LFF GROUP).



4. Our Sourcing Countries



5. Our Policies

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. We promote and commit to respect the International Labour Organization (ILO) declaration on fundamental principles and rights at work, as well as the 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 (but not limited to) the following:



- Bullying and harassment policy +Disciplinary grievance procedure



- Sick pay policy



- Equal opportunities policy



- Whistleblowing policy

OUR SUPPLY CHAINS

To ensure that working conditions meet our aims and objectives we have our Ethical Trading Code of Conduct for Suppliers, our Responsible Sourcing Code of Practice & our Human Rights Due Diligence and Ethical Trading Policy.

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

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

6. Our Due Diligence Process

At LFF UK, we require all first-tier production/manufacturing sites to register on Sedex and complete the Self-Assessment Questionnaire (SAQ).

Sedex is a secured web-based platform which allows organisations to store information about labour standards within their business and to share this with one or more of their customers.

In addition, LFF uses 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.

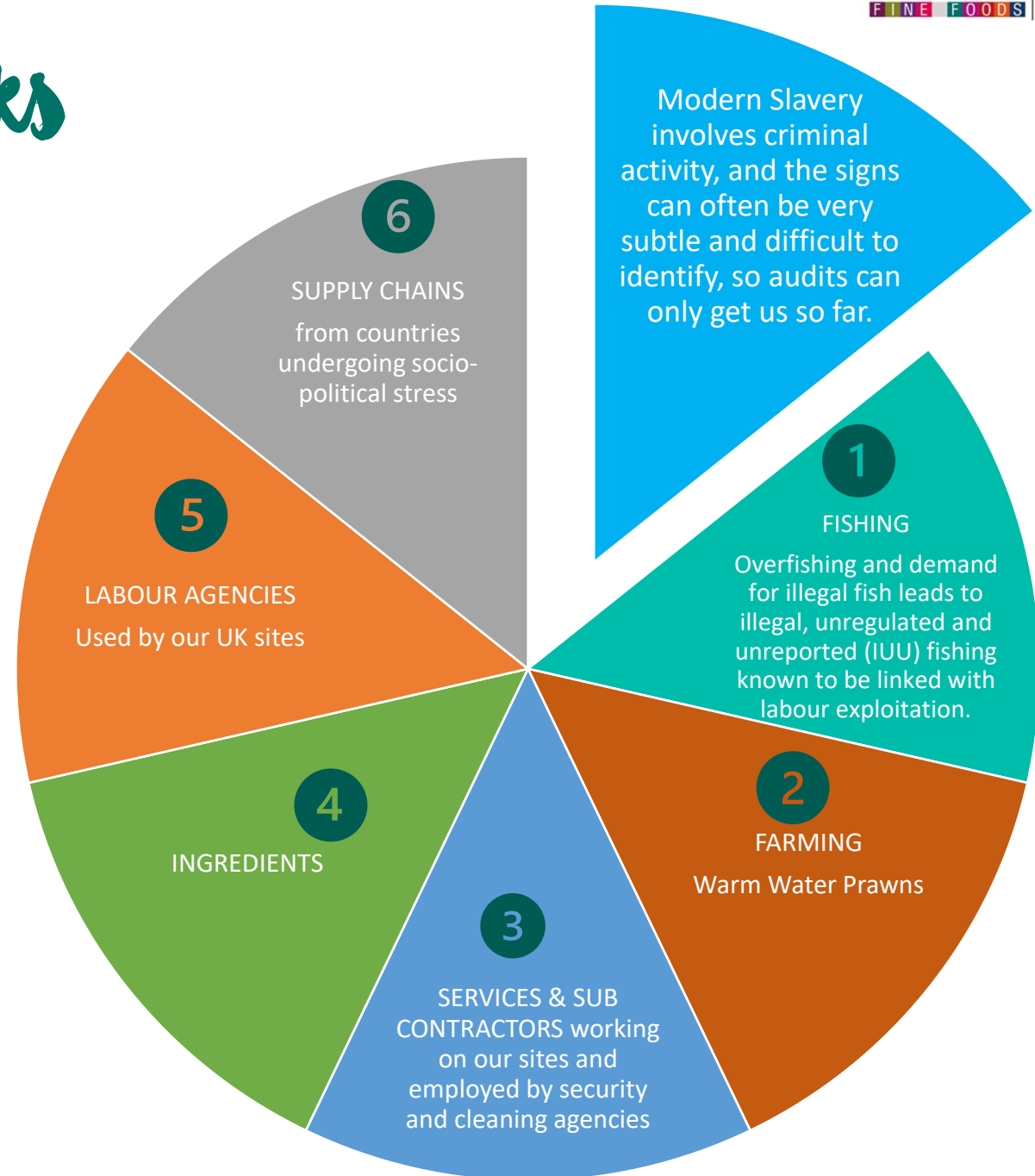


A valid ethical audit must be shared via the Sedex system for all first-tier productions sites identified as High Risk by FNET.

Thanks to this combination of self assessments and audits, we can identify labour rights risks using SEDEX RADAR, a dedicated tool built to identify suppliers operating in high-risk environments or with workers more vulnerable to labour exploitation.



7. Our Priority Risks



8. Our Actions

FISHING

1

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. This is why we have developed our own LFF IUU tool to assess and identify potential risks in our supply chains.

Working together with Seafish we have created and now chair (since 2014) the Ethics Common language group, a collective response to growing concerns regarding unethical practices within the global seafood market.



We continue our engagement with the pre competitive industry action group Seafood Ethics Action Alliance (SEA Alliance) which we have supported since its inception (initially as a chair from Feb22 to Feb23 and as steering committee member).

FARMING

2

We have maintained our active participation in the development and revision of farm, feed and fish meal and fish oil assurance programmes: MarinTrust , Aquaculture Stewardship Alliance (ASC), with a particular focus on strengthening ethical clauses and assessment.

In 2022, LFF, and 2 of our customers (Co-op and Sainsbury's) appointed Impactt to undertake a Human Rights Impact Assessment (HRIA) on our Vietnamese prawn supply chains (processing facilities, farms, hatcheries & feedmills). We commissioned this assessment to help us identify the positive and negative impacts of our business practices on workers at each level of our supply chains.

[HRIAVIETNAM.pdf \(lyons-seafoods.com\)](https://www.lyons-seafoods.com/HRIAVIETNAM.pdf)

8. Our Actions

SERVICES & SUB CONTRACTORS 3

In FY22/23, we extended our human right due diligence to incorporate all our services and subcontractors.

Labeyrie Fine Foods is committed to the highest standards of integrity, ethics and responsible business and expects the same of all contractors and service providers used by the business.

We issued our LFF Contractor and Service Provider Code of Conduct to all LFF Contractors and Service Providers, clearly detailing our expectations. We also started rolling out a new LFF audit programme of all contractors and service providers to verify compliance to the code.

INGREDIENTS 4

In FY22/23, we extended our human right due diligence to incorporate all our packaging and ingredients supply chains.

We have focussed on the transparency of the supply chains of all new ingredients and packaging components and integrated this as part of our approval process.

We expect to have full visibility of the supply chain companies involved, where we deem it a “high risk” for social and ethical malpractice of its workforce.

8. Our Actions

LABOUR AGENCIES

5

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 [Public Register \(gla.gov.uk\)](https://www.gla.gov.uk)

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. Farne latest audit took place on 28.09.22 and Lyons's on 03.05.22



Gangmasters &
Labour Abuse Authority

**stronger
together**

SUPPLYING SITES FROM COUNTRIES UNDERGOING SOCIO POLITICAL STRESS

6

In countries undergoing socio-political stress such as Thailand, we require additional due diligence measures. 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 Issara Institute. <https://www.issarainstitute.org/>.

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.



9. Our progress:



What we said we would do

Issuing our Ethical Trading Code of Conduct for Suppliers, our Shellfish Responsible Sourcing Code of practice and our packaging and ingredients Sourcing Code of Practice to our suppliers & agree on an implementation timeline.

Completing our First Human Rights Impact Assessment

Creating a cross functional LFF UK Ethics Committee

We will progress with our responsible recruitment programme and agree with our top 5 suppliers an action plan to embed responsible recruitment practices.

What we have achieved

Ethical Trading Code of conduct for suppliers issued to all. Shellfish Responsible Sourcing Code of practice issued to all relevant suppliers with implementation timeline agreed. Packaging & Ingredients Sourcing code of practice not issued





We have completed our First Human Rights Impact Assessment. Findings & CAP were published on our website

We have created a LFF UK CSR committee where Ethics is integrated.

Not Completed

10. Key Performance Indicators



		June 2023
	Number of high risk suppliers (based on FNET country risk assessment)	13
	% of high risk sites that have an up to date ethical audit	100%
	Number of non conformances identified through third party audits under “the employment is freely chosen” clause	0
	Number of non conformances identified through third party audits under the “no harsh or inhumane treatment” clause	3








11. Our Targets

Moving forward (FY23/24) we will be building on the activities and progress we made in FY22/23 and focus our efforts to:







- Strengthen our UK operational-level grievance mechanism to ensure everyone at LFF UK is empowered to report issues and concerns so that grievances can be effectively addressed and remediated promptly.
- Working together with our customers, Vietnamese Supply Chains and Stakeholders, implement the improvement plans as detailed in our HRIA CAP report. We will focus on operational-level grievance mechanisms.
- Formalise our LFF UK Packaging and Ingredients sourcing code and communicate to all relevant suppliers whilst continuing rolling out our LFF UK HRDD to all Packaging and Ingredients sourced by LFF UK.
- Continue rolling out the LFF auditing Programme to all Services and Sub contractors used by the LFF UK sites.



12. Participation and Collaboration

Partner		Purpose	Project & Initiative
Aquaculture Stewardship Council (ASC)		The ASC is an independent, international non-profit organisation, that manages the world's leading certification and labelling programme for responsible aquaculture.	Leading champion of KDE Participation in the Living Wage Technical Group ASC CoC licensee holders
Earthworm Foundation		An impact driven global non-profit organisation working on the ground to create scalable solutions for nature and people to thrive. In the field they create, test and scale new ways of production and doing business	Participation in the Ecuadorian Shrimp and the Soya Working Groups
Food Network for Ethical Trade		FNET creates a safe and collaborative space for food companies to share and learn from each other in order to create positive change in their supply chains.	Participation in the Responsible Recruitment & Climate Change Working Groups
Gangmaster & Labour Abuse Authority (GLAA)		The GLAA works in partnership to protect vulnerable and exploited workers. Their licensing scheme regulates businesses who provide workers to make sure they meet the employment standards required by law.	Participation in webinars and training Using the GLAA's public register
Issara Institute		The Issara Institute is an independent NGO based in Asia and USA tackling issues of human trafficking and forced labour through worker voice, partnership and innovation.	Strategic Business Partner since 2014
Living Wage Foundation		The living wage foundation encourages employers to play their part in tackling in-work and post-work poverty and provide a decent standard of living by paying the real living wage.	Accredited Living Wage Employer (Gold Status)
Marine Stewardship Council		The MSC is an independent, international non-profit organisation, that manages the world's leading certification and labelling programme for responsible fisheries.	Supporting our traceability and transparency strategy. MSC CoC licensee holder (Lyons)

12. Participation and Collaboration

Partner		Purpose	Project & Initiative
Marin Trust		MarinTrust is an independent, international non-profit organisation, that manages the world's leading certification programme for responsible production of fishmeal & fishoil.	Member of the Governing Body committee as well as the Social and Ethical committee
Responsible Recruitment Toolkit (RRT)		The RRT is an unparalleled online capacity building tool to help businesses understand, achieve and demonstrate responsible recruitment.	Full Subscription to the RRT tool
Seafood Ethics Action Alliance		The SEA Alliance is a precompetitive collaboration of retailers and seafood businesses aiming to strengthen human right due diligence carried out in the global seafood supply chain, and ensure respect for human rights	Member of the governance and Change on the water fund. Ex chair and Steering committee member (Feb 22 to Feb 23).
Seafish Seafood Ethics Common Language Group		The group looks at social welfare issue that affect the UK Seafood Supply Chains. This covers human trafficking, labour abuses, child labour, debt bondage, forced labour, migrant workers, and modern slavery.	Chair since 2018
SEDEX		With SEDEX, businesses can map, assess, analyse, and report on their supply chains to better manage and improve their ethical performance and work with other businesses	SEDEX AB membership
Stronger Together		Stronger Together provides businesses with practical training, resources, business services and collaborative programme to create a world where workers are recruited responsibly and have fair work free from exploitation	LFF UK reports on the progress reporting tool
Sustainable Seafood Coalition		Sustainable Seafood Coalition develop industry agreed, voluntary codes of conduct on responsible sourcing and labelling.	Member since 2012