

Modern Slavery Statement

LABEYRIE
FINE FOODS | UNITED KINGDOM

For the financial year ended
30 June 2025 (FY24/25)

LET'S ALL BE

Responsible food
enthusiasts

Farne
of Scotland

LYONS SEAFOODS



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Introduction

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

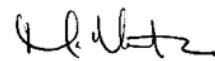
Labeyrie Fine Foods UK (LFF UK) part of Labeyrie Fine Foods (LFF) welcomes the Modern Slavery Act and the duty it places on businesses to disclose publicly the steps they are taking to tackle forced labour and human trafficking.

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 2025. It details our approach, actions, and programmes used to prevent modern slavery and human slavery in our business units and supply chains.

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

Date: 1st November 2025



Mark Newton
Managing Director LFF UK



Linda Dickson
UK HR Director

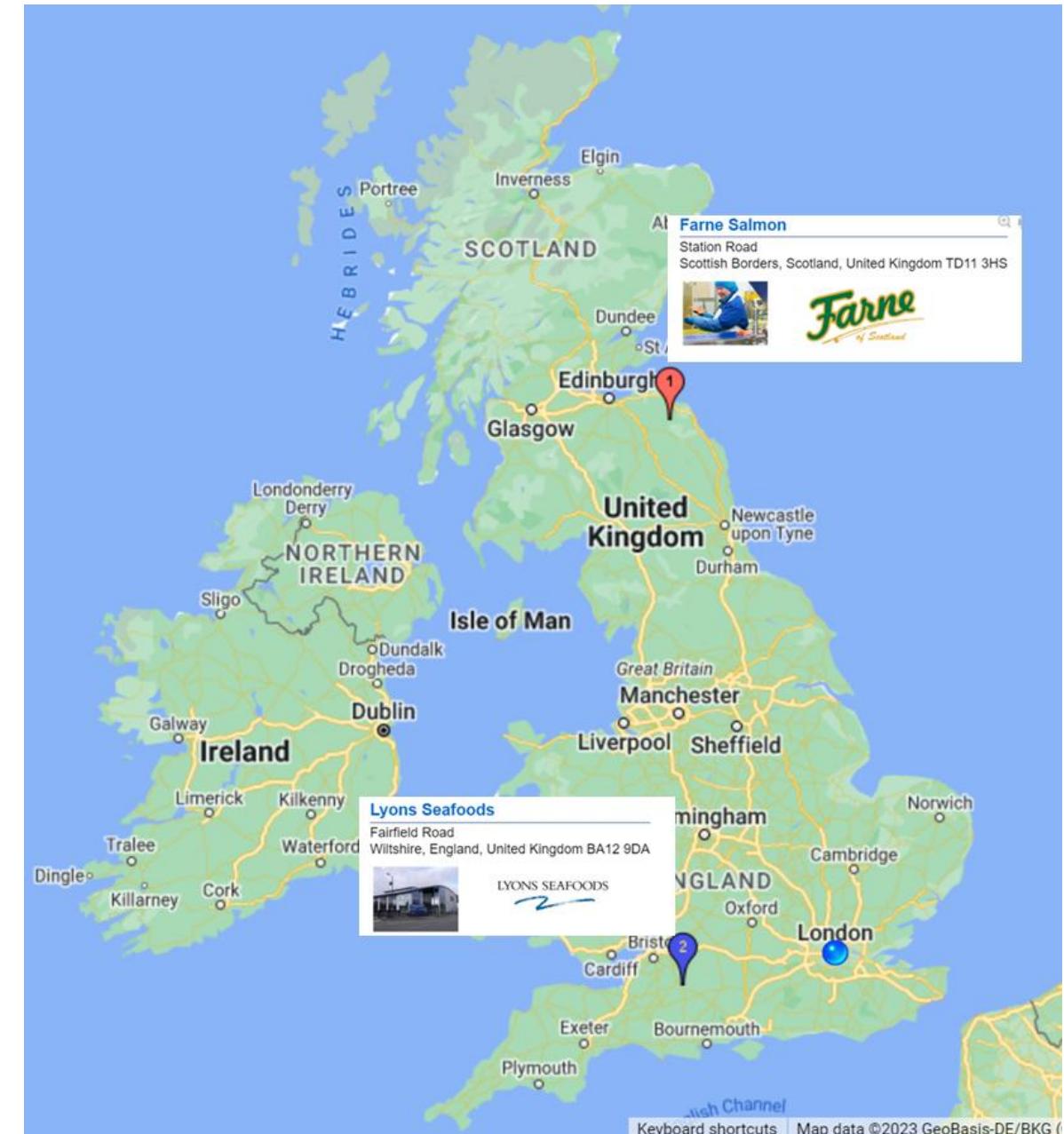
1. Our Business

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, which are sourced Globally, processed in our UK sites and distributed to our retail and manufacturing customer base.

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 500 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 £248m, producing 18.437 Tonnes of product, these two sites were acquired by Labeyrie Fine Foods Group in 2004.



2. LFF UK : Our People

Number of Employees: 1004

% of Male workers: 62

% of Female workers: 38

% Permanent Employees: 91

% Temporary Employees: 9

% Young Workers: 0.6

% UK Nationals : 55

% Non-UK Nationals: 45

% Agency: 10

 Employment is freely chosen	 Freedom of association and the right to collective bargaining are respected	 Working conditions are safe and hygienic
Slavery and bonded labour are totally unacceptable. Almost 21 million people are victims of forced labour.	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.	An estimated 2.3 million people die every year from work-related accidents and diseases.
 Child labour shall not be used	 Living wages are paid	 Working hours are not excessive
168 million children work to support their families, missing out on education and often damaging their health. This reinforces the cycle of poverty.	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.	Long working hours are the norm for most of the world's workers. This damages people's health and undermines family life.
 No discrimination is practised	 Regular employment is provided	 No harsh or inhumane treatment is allowed
Women and certain minorities are often confined to the lowest-paid jobs with no access to training or promotion.	Most workers can be laid off when it suits the employer. This fuels poverty and insecurity and drives down wages.	Few workers have protection against physical, verbal or sexual abuse in the workplace.



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 Director of Sustainability and Supplier Assurance reports directly into the Managing Director and leads a specialist team of experts that define 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](#)).

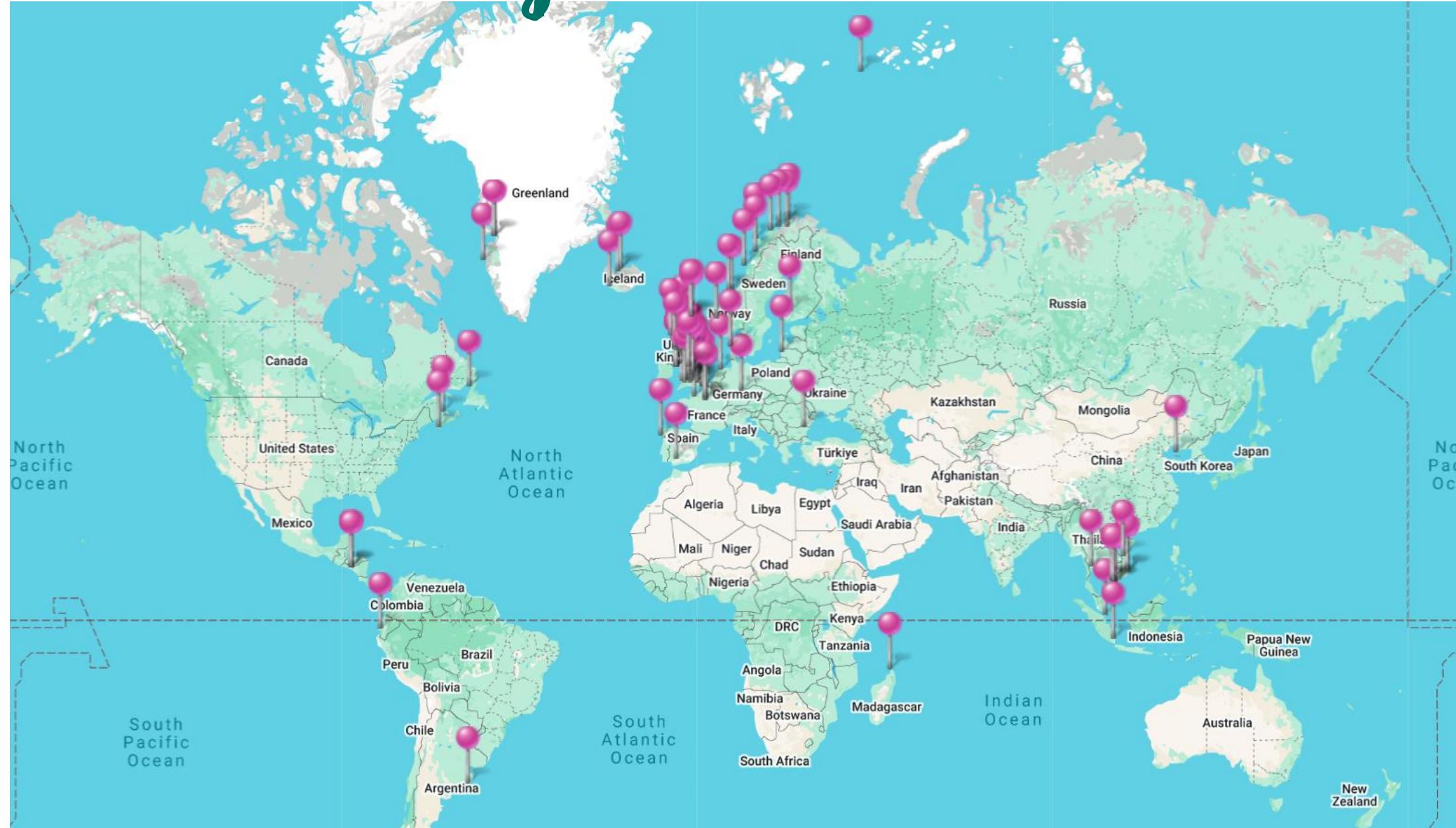


OUR VALUES

To achieve our mission we have developed a set of goals which we will continuously work with our Stakeholders to deliver:

 RESPONSIBILITY We take responsibility for our own attitude, behavior, performance and results	 PERFORMANCE We work together to achieve fantastic results.	 PEOPLE We have relationships that are based on honesty, courtesy, respect and trust. This is at the heart of everything we do.
 ENVIRONMENT We have a positive working environment. We recognise, value encourage and develop everyone's contribution.	 CUSTOMERS We deliver excellent quality and service in every way, both internally and externally.	 COMMUNICATION We are passionate about open, honest and constructive two way communication.

4. Our Sourcing Countries



5. Our Policies & Communication

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 Organisation (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
- Equal opportunities policy
- Whistle blowing policy
- Child labour and remediation 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

Full Supply Chain Mapping

We have complete mapping and visibility of our supply chains through the **Ideagen Authenticate** online platform. This ensures transparency and traceability, helping us identify potential risks and maintain ethical standards throughout the supply chain.

Risk Assessment

Labeyrie Fine Foods applies a country-level risk assessment developed by the Food Network for Ethical Trade (FNET), which rates countries from high to low risk.

Country-level risk ratings allow us to prioritise resources and focus on regions with higher human rights and ethical risks.

Sedex Registration

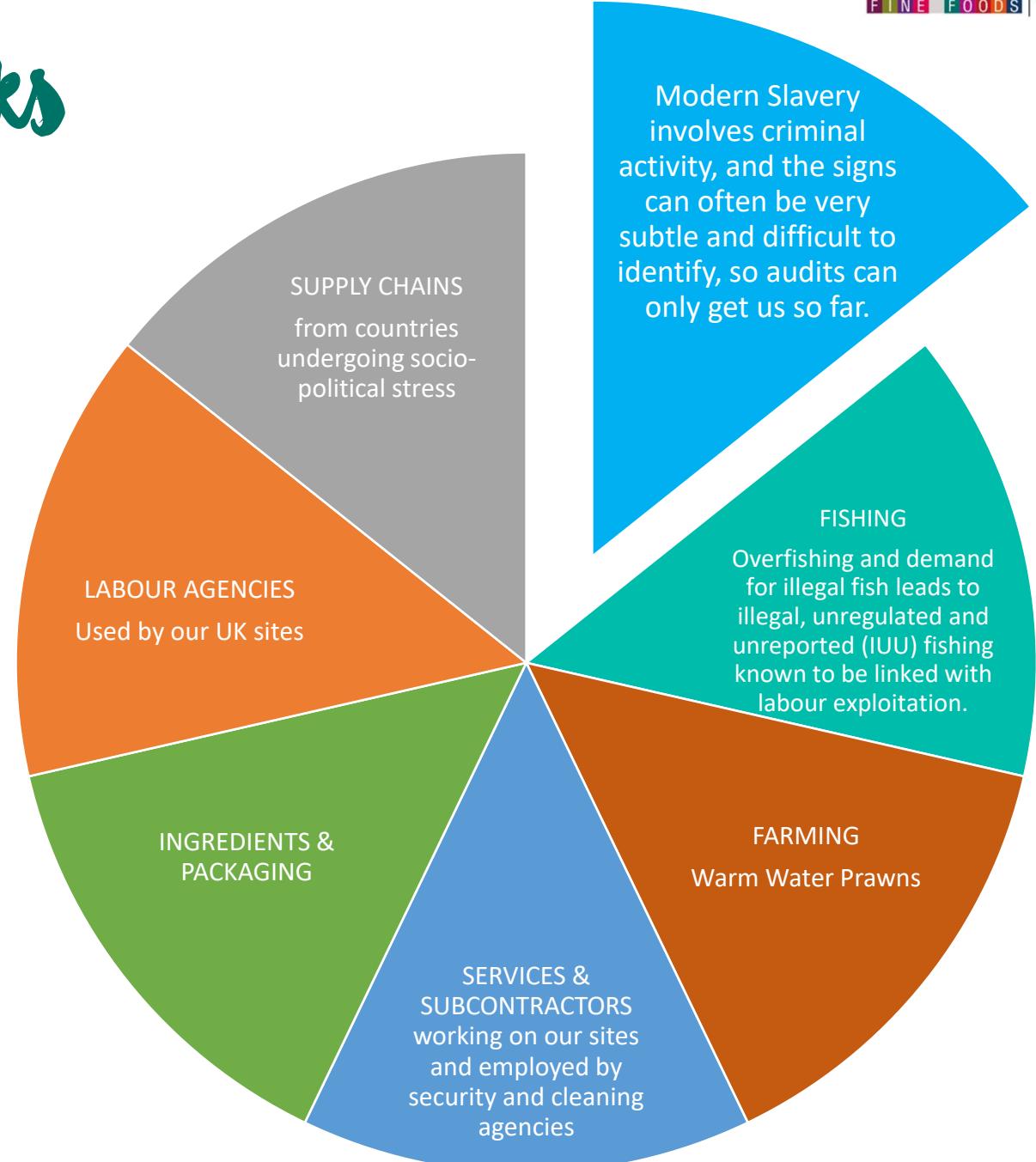
All first-tier production/manufacturing sites must register on Sedex and complete the Self-Assessment Questionnaire (SAQ). Sedex is a secure platform for storing and sharing information on labour standards.

Sedex provides a standardized way to monitor compliance and share ethical data, improving accountability across suppliers.

Ethical Audits for High-Risk Sites

A valid ethical audit must be uploaded to Sedex for all first-tier production sites identified as High Risk by the Sedex RADAR tool. Audits verify that corrective actions are taken and ensure high-risk sites meet our ethical and social responsibility standards.

7. Our Priority Risks



8. Our Actions

Fishing & Farming

- **Developed LFF IUU Risk Tool**

Overfishing and illegal, unregulated, and unreported (IUU) fishing are linked to labour exploitation and trafficking. We created our own tool to assess and identify potential risks in our supply chains to help us identify risks with unethical fishing practices.

- **Chairing Ethics Common Language Group (since 2014)**

Working with Seafish, we lead a collective to promote industry-wide alignment on ethical standards.

- **SEA Alliance Steering Committee Member**

We actively engage with the Seafood Ethics Action Alliance, a pre-competitive industry group tackling labour and human rights issues committed to drive systemic changes.

- **Participation in Assurance Programme Development**

We contribute to the development and revision of standards such as MarinTrust and Aquaculture Stewardship Council (ASC), focusing on strengthening ethical clauses.

We are committed to ensuring certification schemes address human rights risks and improve accountability across fisheries and aquaculture.



Supply Chain Mapping

- **Partnership with Authenticate (2025)**

To increase transparency and traceability, reducing risk of unethical practices in complex supply chains LFF UK partnered with Authenticate to manage supply chains via an online portal, linking sites through products to customers.

- **Single Collaboration Platform**

The system allows communication with multiple suppliers simultaneously for policy updates and responses to emerging ethical issues.

This has improved efficiency and ensures rapid alignment on compliance and human rights standards.

8. Our Actions

Services & Sub-Contractors

- **Continued Human Rights Due Diligence**

To prevent exploitation and protect vulnerable workers in extended supply chains, we have maintained rigorous checks on all services and subcontractors to ensure compliance with ethical and legal standards.

- **Commitment to Integrity & Ethics**

To align all partners with our core values, reducing reputational and operational risks, Labeyrie Fine Foods upholds the highest standards and expects the same from all contractors and service providers.

- **Issued Code of Conduct**

To provide transparency and accountability, ensuring consistent ethical practices across all partners, we have distributed the LFF Contractor and Service Provider Code of Conduct to clearly outline expectations.

Labour Agencies

- **GLAA License Verification**

To prevent exploitation and ensure compliance with UK labour standards, we ensure all temporary labour providers hold a current GLAA License by checking the Public Register (gla.gov.uk).

- **Positive Approach to Worker Training & Development**

To build awareness of modern slavery risks and support ethical recruitment practices, we promote good people relations and use resources from Stronger Together.

- **HR Team Training**

To equip our team to identify and address labour exploitation risks effectively all HR members have attended Stronger Together and GLAA workshops.

- **Agency Audits**

To ensure all service partners meet our ethical standards and human rights commitments, we have completed audits on agency providers, canteen services, and cleaning contractors.

8. Our Actions

Ingredients and Packaging

- **Extended Human Rights Due Diligence**

To strengthen ethical oversight beyond core manufacturing, reducing risk of labour exploitation in upstream supply chains, we expanded due diligence to our largest suppliers of packaging and ingredient supply chains.

- **Transparency in Approval Process**

To ensure that new suppliers meet ethical standards before onboarding, preventing hidden risks, we have integrated supply chain transparency for all new ingredients and packaging components into our approval process.

- **Full Visibility for High-Risk Supply Chains**

To allow proactive monitoring and intervention to protect workers and maintain compliance with human rights standards, we require complete visibility of companies involved where there is a "high risk" of social or ethical malpractice.

Why it matters:

Training and Awareness

We have dedicated specialised training for key personal at LFF UK such as:

- Stronger Together - Tackling Modern Slavery in UK Businesses
- Ensuring effective workplace Grievance Procedures
- Introduction to responsible recruitment
- Fair equal and dignified opportunity and treatment
- Labour supply chain due diligence and partnerships
- Stronger Together Effective Human Rights Due Diligence in Supply Chains
- BRCGS - Global Standard Ethical Trade and Responsible Sourcing Issue 2.1 Auditor Training .

In line with recommendations from Stronger Together we have enhanced our induction programme to new on board employees to include awareness of Modern Slavery videos.

In addition, both sites have fully embedded the Stronger Together " preventing hidden labour exploitation" guidance into HR briefings and managerial training sessions, ensuring that managers have the tools to identify signs of forced labour.

9. Our progress:

What we said we would do

Working together with our customers, Vietnamese Supply Chains and Stakeholders, implement the improvement plans as detailed in our HRIA CAP report focusing on capacity building with our producers.

Fully implement our LFF UK Packaging Sourcing Code and formalise a LFF UK Ingredients sourcing code.

Focus on operational-level grievance mechanisms with our key suppliers, and review where improvements can be made so that workers are empowered to report issues as and when these occur.

Build on the success of our internal VOICE committee as a tool to interact with our workforce and widen its initial focus beyond bullying and harassment.

What we have achieved

Project put on hold indefinitely due to change in supply chains since the report was published.

Packaging / plastic sourcing code now in place, UK ingredients sourcing code WIP

Full mapping completed, assessments of hot stops underway

The Employee Voice forum (EVF) has been successful in raising two key concerns, helping to review a number of internal process and policies such as Grievance, Anti-bullying & Harassment and Equality policies.



10. Key Performance Indicators



	June 2024	June 2025
Number of high-risk suppliers (based on FNET country risk assessment)	13	14
% of high-risk sites that have an up to date or scheduled ethical audit	100%	100%
Number of non-conformances identified through third-party audits under “the employment is freely chosen” clause	5	1
Number of non-conformances identified through third-party audits under the “no harsh or inhumane treatment” clause	6	6

11. Our Targets for the next financial year

Moving forward (FY25/26) we will be building on the activities and progress we made in FY24/25 and focus our efforts to:

- Fully implement our LFF UK Packaging Sourcing Code and formalise the LFF UK Ingredients sourcing code.
- Grievance mechanism in our supply chain: taking the learnings from the identified hotspots and working with two key suppliers to improve operational level grievance mechanisms.
- Take the Employee Voice Forum to the next phase during 2026, focusing on increased participation from non-managerial colleagues.
- HR Team to investigate collaboration with lived experience organisations, to increase awareness of modern slavery within our organisation. Resource to be included in the 2026 budget to facilitate this.



12. Participation and Collaboration

Partner	Purpose	Project & Initiative
Aquaculture Stewardship Council (ASC)	 <p>The ASC is an independent, international non-profit organisation, that manages the world's leading certification and labelling programme for responsible aquaculture.</p>	Leading champion of KDE Participation in the Living Wage Technical Group ASC CoC licensee holders
Earthworm Foundation	 <p>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</p>	Participation in the Ecuadorian Shrimp and the Soya Working Groups
Food Network for Ethical Trade	 <p>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.</p>	Participation in the Responsible Recruitment & Climate Change Working Groups
Gangmaster & Labour Abuse Authority (GLAA)	 <p>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.</p>	Participation in webinars and training Using the GLAA's public register
Living Wage Foundation	 <p>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.</p>	Accredited Living Wage Employer (Gold Status)
Issara Institute	 <p>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.</p>	Strategic Business Partner since 2014
Ideagen Authenticate	 <p>With over 60,000 companies from 160 countries accessing Ideagen Authenticate to collaborate with customers and suppliers, the scalable software is trusted to improve transparency through the tiers.</p>	Supply chain mapping system, implemented early 2025 as the new LFF UK platform for supply chain management.
Marine Stewardship Council	 <p>The MSC is an independent, international non-profit organisation, that manages the world's leading certification and labelling programme for responsible fisheries.</p>	Supporting our traceability and transparency strategy. MSC CoC licensee holder (Lyons)

12. Participation and Collaboration

Partner	Purpose	Project & Initiative
Marin Trust	 <p>MarinTrust is an independent, international non-profit organisation, that manages the world's leading certification programme for responsible production of fishmeal & fishoil.</p>	Member of the Governing Body committee as well as the Social and Ethical committee
Responsible Recruitment Toolkit (RRT)	 <p>The RRT is an unparalleled online capacity building tool to help businesses understand, achieve and demonstrate responsible recruitment.</p>	Full Subscription to the RRT tool
Seafood Ethics Action Alliance	 <p>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</p>	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	 <p>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.</p>	Chair since 2018
SEDEX	 <p>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</p>	SEDEX AB membership
Stronger Together	 <p>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</p>	LFF UK reports on the progress reporting tool
Sustainable Seafood Coalition	 <p>Sustainable Seafood Coalition develop industry agreed, voluntary codes of conduct on responsible sourcing and labelling.</p>	Member since 2012