



Modern Slavery Statement 2021

Introduction

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

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.

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.

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 2021. It details our approach, actions, and programmes to prevent modern slavery and human slavery in our business units and supply chains.

Our organisation's structure

The scope of this statement covers all LFF UK sites namely Farne Salmon and Trout Ltd and Lyons Seafoods Ltd.

Both sites are owned by the Labeyrie Fine Foods Group which was founded in the southwestern France in 1946.

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

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 the UK leading Speciality Private Label Seafood Business. We supply species such as warm water and cold-water prawns, salmon, mussels, scallops, squid, and crayfish.

We employ 1,000 staff across both sites with a very diverse and global supply chain.



Our Values

At Lyons Seafoods 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.

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

The Head of Sustainability reports directly to Mark and leads a specialist team that defines and implements action plans tailored to our individual customer needs and vision, in line with our group's overall strategy.

AT THE HEART OF EVERYTHING WE DO...



TEAM LYONS

We work collectively in an environment where people support each other and take a shared responsibility.



TRUST

We act with integrity and all our dealings are based on trust.



EMBRACE CHANGE

In our response to different needs and opportunities we are flexible and have a sense of urgency - we commit to continuous improvement in all we do.



CUSTOMERS ARE KEY

To delight our customers and consumers we strive for the highest standards in all we do.



VALUE IN PEOPLE

We respect each other, promoting learning, development and empowerment - we value all contributions and ideas, and celebrate individual and company successes.



OPEN & HONEST

We are committed to open two-way communication, keeping each other informed and encouraging feedback.



Our supply chains

We have a global sourcing strategy with very complex value chains.



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 standards we have our Ethical Trading Code of Conduct for Suppliers, our Shellfish Responsible Sourcing Code of practice & our Ingredients and Packaging Sourcing Code of practice.

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 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 whistleblowing as well as to 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 the 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. Farne latest audit took place on 29.10.20 and Lyons's on 29.11.19

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.

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

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

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. 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/>.

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 frameworks 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) We continue our engagement with the pre competitive industry action group Seafood Ethics Action Alliance (SEA Alliance) which we have supported since its inception.
- 4) 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>
- 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:
 - MarinTrust Governing Body Committee, a unique international certification programme for marine ingredients certification [About Us | MarinTrust \(marin-trust.com\)](https://www.marin-trust.com)
 - Active participation in the development and revision of farm and fishery assurance programmes such as RFVS (Responsible Fishing Vessel Scheme), MarinTrust, Aquaculture Stewardship Alliance (ASC), Marine Stewardship Alliance with a particular focus on strengthening ethical clauses and assessment
 - 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 20 / June 21)- LFF UK did not identify instances of modern slavery in its supply chain.

2020 has been an unprecedented year due to the global pandemic and the many restrictions imposed by governments globally.

We have taken the opportunity to review and reassess our internal processes, revise our sourcing and ethical policies. We have implemented new ways of working and incorporated remote auditing as part of our due diligence process.

Moving forward we will be building on the activities and progress we made in 20/21 and focus our efforts on:

- Creating a cross functional LFF UK Ethics Committee
- 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
- In 2020, we've been mapping the recruitment dynamic for all our suppliers. We will progress with our responsible recruitment programme and agree with our top 5 suppliers an action plan to embed responsible recruitment practices.

This policy statement will be reviewed and published annually.

Mark Newton
Managing Director
Labeyrie fine Foods UK
July 29th, 2021