

# Modern Slavery Statement

April 2020 – March 2021



The World Wise Foods Group is committed to understanding the modern slavery risks within our businesses and to put controls in place to mitigate against the risks. We are committed to ensuring that workers in our supply chains are treated with dignity, and that human rights are respected. We fully support the UN Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights and take seriously our responsibility to prevent, mitigate and remediate human rights abuses both through our own actions, and collaboration with others.

This is the fifth modern slavery statement produced by World Wise Foods made pursuant to section 54 of the Modern Slavery Act 2015. This is the first statement which has been expanded to cover additional companies in the World Wise Foods Group. The statement provides an update on the activities and commitments set out in the last World Wise Foods modern slavery statement, and the steps taken by the World Wise Foods Group to prevent modern slavery within our supply chains during the financial year 2020/21 (ending March 31<sup>st</sup> 2021). It also includes the plans to further develop this work in 2021/22.

## About the World Wise Foods Group

The World Wise Foods Group is made up of three separate business entities. World Wise Foods, Nature's Finest and American Tuna. This report covers actions taken by World Wise Foods and Nature's Finest who are both based in the UK. American Tuna follows US modern slavery reporting requirements. World Wise Foods provides leadership on responsible sourcing for the whole group.

World Wise Foods is a distributor supplying private label and branded ambient food products to leading retailers, manufacturers and food service businesses worldwide. Nature's Finest Food Products Ltd is a food company supplying a range of branded foods to leading retailers, convenience stores, wholesalers and food service businesses. We have UK offices with staff covering commercial, finance, supply chain and technical functions including food technologists in our Thailand office which provides additional technical expertise closer to our supply base. Storage and distribution is handled by contracted third parties based in the UK and Europe.

We have direct relationships with the manufacturing sites of our finished products, and in some cases also work directly with raw material suppliers. We work closely with our suppliers in Africa, South-East Asia, Europe and North America – we have worked with 60% of our supplier partners for over 5 years. The lasting relationships we have in place position us to drive continuous improvement on ethical standards within our supply chains.



\* Revenue from 01 April 2020-31 March 2021

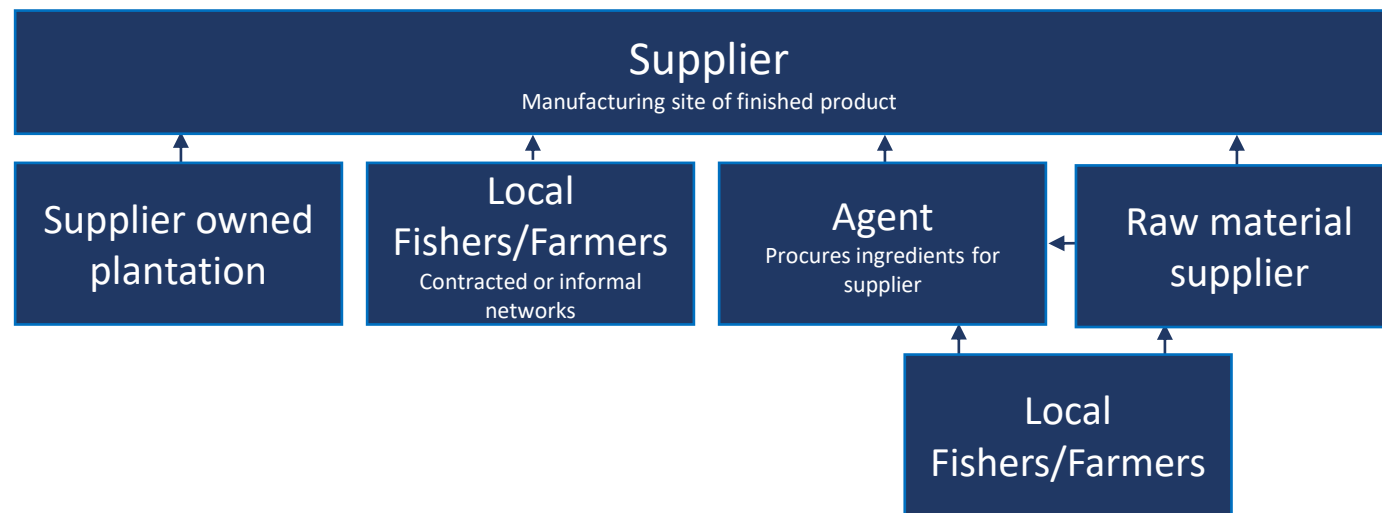
\*\* Our risk scoring process was updated in 20/21, a large proportion of our suppliers are in countries rated as high risk by FNET.

# Our Supply Chains

The World Wise Foods Group divides its supply chains into two categories;

1. **Private label and branded food products for leading retailers, manufacturers and food service businesses:** These products are developed and launched through collaboration with customers, supplier partners and employees in our commercial and technical teams and supplier partners.
2. **Outsourced support services:** These services (IT, communications, cleaning, product testing, storage and distribution etc) are procured and managed by the Managing Director of Nature's Finest and the World Wise Foods Operations Director, Technical & Sustainability Director, Supply Director and their respective teams.

Raw material supply chains can be complex – for example one of our oriental sauces may contain 30 raw materials from 24 suppliers in 5 countries. The majority of agricultural supply chains involve seasonal produce. A general outline of our supply chains to ingredient level is below, the only change since our last statement is that World Wise Foods now purchases some of our own raw materials (whole round fish) and deliver these to supplier partners for further processing. Supplier partners will use a combination of these different sources depending on the product;



Supply Chain Transparency is an important area for us - it is key to managing product safety, product quality and integrity, and human rights risks. World Wise Foods has met our 19/20 commitment to publish a list of our tier one suppliers and the source of all our fish on our website. The fish sourcing is also shared through the Ocean Disclosure Project. These disclosures will be updated annually.

The World Wise Foods Group completed a risk assessment in 2018/19 of all our raw materials from tier one and tier two suppliers. This assessment, including data from the Food Network for Ethical Trade (FNET) risk assessment database has enabled us to identify human rights risks to raw material level. We continue to review raw material risks as part of our horizon scanning and as part of our Vulnerability Analysis Critical Control Point (VACCP) assessments and in 20/21 have set targets to map all our priority raw materials to source, and have begun projects on four\* of these raw materials to mitigate against identified risks.

\*Tuna, Tomato, Salmon, Coconut

# World Wise Foods Group Policies & Due Diligence Procedures

We have a number of internal policies and procedures which demonstrate our commitment to ensuring modern slavery is not present within our business or supply chains. Implementing these policies in our own business, and in our supply chains help to raise the level of understanding of the risks of modern slavery and how we can mitigate against these. Policies are as described in detail in our 18/19 statement, updates are included below.

**1. Responsible Sourcing Code of Practice for Suppliers** (2018): This policy outlines the standards all our tier one supplier partners are expected to meet. It includes a focus on the ETI base code, health & safety, the environment and social audit requirements. World Wise Foods have met our commitment for 100% of supplier partners to accept this policy by December 2021. All new supplier partners will be required to accept this before supply commences; this is tracked as one of our Food for Thought KPIs. The Code of Practice is available on the World Wise Foods website.

**2. Human Rights policy** (2018): This policy identifies the most vulnerable groups within our supply chains as migrant workers, women and child labour/young workers. It gives very detailed requirements of supplier partners relating to these vulnerable groups, and forms a framework for our assessment of supplier partners to secure continuous improvement. The policy is available on the World Wise Foods website in English, and Thai to improve accessibility for our Thai supplier partners Human Resources teams.

**3. Supplier Approval and Monitoring Procedure**: All our direct suppliers are approved through a formal process which includes a review of their compliance against our ethical criteria. We assess new supplier partners against the requirements outlined in our Responsible Sourcing Code of Practice as part of our Supplier Approval Process.

**4. Supplier Performance Review Procedure**: The performance of all World Wise Foods direct supplier partners is reviewed on a quarterly basis, this assessment has always included a review of ethical performance. We measure supplier performance reviewing both audit data, known risks and a measure of how committed the supplier is to continuous improvement. A summary of risks is reported to the World Wise Foods Board and Nature's Finest Managing Director quarterly.

**5. Our internal policies**: The World Wise Foods Group has a number of policies that aim to ensure modern slavery issues are mitigated against within our own operations. These include our business values, Equality and Diversity Policy and Business Code of Conduct Guidelines. We regularly review our employee facing policies against industry best practice and welcome employee feedback through our bi-annual group meetings. World Wise Foods has an Employee Working Group and gathers worker feedback through an annual employee engagement survey.

The Chief Executive is responsible for ensuring World Wise Foods meets its human rights responsibilities, the Managing Director holds this responsibility for Nature's Finest. The Board of Directors for both companies also holds this responsibility; the Chair of both Boards of Directors is John Burton. Ethical risks and progress against objectives are reported quarterly to senior managers, board members within World Wise Foods and for Nature's Finest to the Managing Director. For World Wise Foods progress is reported against human rights KPIs in our sustainability plan. All policies and procedures are approved by World Wise Foods and Nature's Finest respective CEO, Managing Director and Boards of Directors alongside relevant members of the Senior Management Team.

The Sustainable Sourcing & Ethical Trade Manager works in collaboration with senior managers, and supplier partner facing colleagues to ensure these policies are implemented in practice. If there is a case of ongoing non-compliance, the Technical and Sustainability Director brings together relevant senior managers to agree next steps and monitor progress towards compliance.

Day to day implementation of our approach to human rights risks sits with the Sustainable Sourcing & Ethical Trade Manager who is part of the Technical Team and reports to the Director of Technical & Sustainability. In 20/21 we have invested further in our capacity in this area expanding the team to include two part time positions; a Responsible Sourcing Assistant based in the UK, and an Ethical Trade Consultant based in Thailand.

# Risk Assessment

The World Wise Foods Group recognises that there are risks of modern slavery in areas of our business where;

- Suppliers are based in countries rated as high risk for human rights issues by our risk assessment which includes country level risk ratings from the FNET risk assessment tool
- Products include raw materials that the FNET risk assessment tool has identified as high risk for human risks issues due to reported issues in their source country
- Migrant labour is used
- Child labour or young workers (particularly at farm level, or on-board fishing vessels) could be used
- Women workers are employed
- Recruitment channels without robust checks and balances that protect workers from paying recruitment fees are utilised

The World Wise Foods Group continuously assesses risks. Our 2018 risk assessment rated all our raw materials as high, medium or low risk based on criteria including known human rights risks at country and ingredient level; this process determined our priority raw materials. We horizon scan for raw material risks continuously, using our own sources and through participating in relevant FNET working groups and as part of our VACCP horizon scanning. We have targets set to research risks and agree sourcing principles that mitigate these risks for all our priority raw materials; we track progress on this through a World Wise Foods KPI.

Our supplier partners are assigned a risk score which is reviewed bi-annually and which refers to the FNET risk rating tool for country risk data. This score now also reflects our knowledge of the supplier partner and their ethical performance over the last period. The score determines which are our priority supplier partners for engagement on human rights issues; this list is usually dominated by supplier partners in high risk locations (as defined by the FNET risk tool).

Human rights risk factors are also included in our supplier partners quarterly ethical performance rating which directly contributes to supplier partner performance scores. We follow up on identified risks through audit review and site visits, and address risks through thematic projects with supplier partners and with third party organisations. These projects are led by the Sustainable Sourcing & Ethical Trade Manager.

## Priority Ingredients:

Coconut, Pineapple, Tropical Fruits (Jackfruit, Papaya, Mango), Fish Derivatives, Tomato, Dried Herbs & Spices, Peanuts, Sugar, Rice, Tuna, Soy, Cashew, Salmon

## High Risk Supplier Locations:

Indonesia, Malaysia, Maldives, South Africa, Swaziland, Thailand, Morocco (as per FNET risk rating tool)

# Our Priorities & Approach

Our approach to delivering against our priorities related to human rights;

1. **Continuous improvement:** Ensuring our policies and procedures reflect best practice and our supply chain partners are making continuous progress to become compliant
2. **Capacity Building for our Supply Chain Partners:** Providing support to supply chain partners directly, or through third party experts, to build capacity to mitigate human rights risks
3. **Collaborating for Change:** Working with our peers, customers and competitors to share knowledge and drive industry level improvements

World Wise Foods outlined KPIs in their sustainability plan "Food for Thought" which links to their approach to managing human rights. This approach is shared by World Wise Foods and Nature's Finest – references to KPIs in this report refer only to World Wise Foods.

## Continuous Improvement: 20/21

Met World Wise Foods target of 95% of supplier partners achieving their target performance score

Met World Wise Foods target for all suppliers partners to accept our Responsible Sourcing Code of Practice.

Made good progress on our risk assessment of our transport and logistics supply chains identifying risks from when our products leave our suppliers, to delivery to customers

Delivered on World Wise Foods transparency commitment by disclosing our tier one supplier partners on our website, and sharing the source of our fish products with the Ocean Disclosure Project

World Wise Foods has formalised sourcing principles, or set targets to complete supply chain mapping and research risks for all our priority raw materials. The projects on priority raw materials were delayed due to COVID preventing on site supplier visits therefore our KPI is measured as "progress needed".

Met our commitment to continuously review human rights risks at country and ingredient level directly, and in collaboration with FNET working groups to ensure we identify changes in risks

100% of supplier ethical audits were completed and actions to address non-conformances agreed with supplier partners and customers. 93% of supplier partners had audits on schedule despite COVID, only 2 suppliers audits were delayed.

World Wise Foods achieved a 7% improvement (out of a target of 10%) in supplier partner compliance to our human rights policy - assessments are most effective completed face to face and this has been limited by COVID. For this reason we have maintained our assessment at 50% of suppliers in high risk locations against our human rights policy (target was 75%).

From our assessments against our human rights policy, we have 11 active ethical improvement projects as part of our collaborative approach to support supplier partners to achieve 100% compliance.

## 2. Capacity Building and Training: 20/21

Extended our ethical trade team to include our Ethical Trade Consultant in Thailand who has built positive relationships with HR teams, broken down language barriers, and has enabled us to support suppliers in person despite COVID limited travel from the UK

Made good progress on our commitment to address recruitment fees by 2025;

- Developed a detailed toolkit with guidance and resources to support supplier partners
- Directly support, or facilitated third party support to three suppliers providing training on responsible recruitment and expert support to put in place responsible recruitment policies and procedures
- Completed detailed worker interviews at one supplier to identify fees paid and debt risks

Developed interactive training on "respect in the workplace" and human rights and delivered this in collaboration with our supplier equipping them to use this training style with workers and supervisors going forward. As a result the supplier partner has updated their worker communication (orientation, handbook) and committed to complete this engaging human rights training continuously with all workers

Supported a supplier to implement an action plan to address human rights risks, and to improve grievance mechanisms monitoring progress against timebound targets

Developed an internal policy and procedure for suppliers to minimise the risks associated with clandestine travellers entering trucks in transit to the UK, and supported suppliers to put these procedures into place

Identified and agreed a third party grievance mechanism for workers at a supplier partner identified as priority through our risk assessment

Conducted remote training with FNET for the World Wise Foods Board of Directors, and employees who visit supplier partners on modern slavery risks, responsibilities and identifying vulnerable workers.

Conducted remote training with a supplier partner on the value of worker representation to equip them to establish an effective worker committee in a highly seasonal factory environment

Provided guidance on best practice employment during COVID to suppliers (including in Thai) in April. The guidance was adapted and adopted by FNET

## 3. Collaborating for Change: 20/21

Joined the Steering Committee of the Seafood Ethics Action Alliance;

- Supported the SEA Alliance application for funding which will enable a step change in their work on human rights risks in fisheries in the next two years
- Participated in the working group on fishery risk assessment

Supported Human Rights at Sea to produce respected research on the risk to observers on vessels which has contributed to a step change in industry engagement in this issue

Supported the development of the Global Tuna Alliance KPIs on social responsibility which all GTA members will be reporting against as part of their five year strategy

Continued active engagement in the FNET working groups on responsible recruitment, worker representation and sourcing raw materials

Continued our collaboration with our NGO partner the International Pole and Line Foundation (IPNLF) in the Maldives to progress mitigating risks for crew on vessels

Contributed feedback on the Marks & Spencer updated Human Rights Policy and Human Rights Due Diligence guidance, and Tesco forced labour strategy

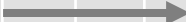

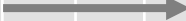
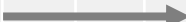
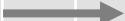
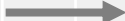

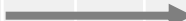
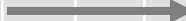



Continued support for the Global Seafood Assurances phase two research into effective grievance mechanisms on vessels



## Progress on commitments: 2020 – 2023

Commitments for 20/21 were aligned to reflect the KPI's in our sustainability strategy "Food for Thought".

If KPI's related to specific companies in the group this is referenced in the text below.

Commitments 2020/21	Just starting out	Progress Needed	Good Progress	Achieved
Investment in supply base relationships ensures our supplier partner performance scores are met (World Wise Foods)				
All World Wise Foods suppliers are committed to working towards our Responsible Sourcing COP for Supplier Partners				
All Nature's Finest suppliers are committed to working towards our Responsible Sourcing CoP for Supplier Partners by April 2023				
All supplier ethical audits completed and actions to address non-conformances agreed with retailers				
The planned actions for the responsible and sustainable sourcing of priority raw materials are delivered on target (World Wise Foods)				
Supplier partners in high risk locations demonstrate 10% year on year improvement in compliance to the group human rights policy (World Wise Foods)				
At least 75% of priority suppliers identified through the World Wise Foods Group bi-annual risk assessment are assessed against compliance to Human Rights policy and ethical action plans are developed where required				
Supplier partners demonstrate measurable progress towards embedding responsible recruitment practices by 2025				
Risks in our transport and logistics supply chains are assessed and actions taken in collaboration with supply chain partners by April 2023				
World Wise Foods supply chain transparency report is published annually on their website				
Active collaboration with industry groups (FNET/SEA Alliance) on human rights risks in our supply chains				
Ongoing review of human rights risks at country and ingredient level				

# Assessment of Effectiveness in preventing modern slavery

Modern slavery is complex and takes many forms. The World Wise Foods Group takes its responsibility seriously – we are committed to identifying where the risks of modern slavery are in our supply chains and to ensuring we are mitigating against these risks. We achieve this by working with our customers, supplier partners and also through engagement with further tiers of our supply chain such as fishers in small scale fishing communities. We also actively engage in industry groups.

This has been a challenging year to meet our targets – with 100% of our supply base outside the UK, COVID has restricted our ability to visit and support supplier partners in person. We have adapted to this challenge by extending our ethical trade team to include an Ethical Trade Consultant in Thailand who has been able to support our supplier partners directly building their capacity on responsible recruitment, effective grievance mechanisms and worker communication.. For other suppliers we have adapted to working online, but in places where face to face collaboration is needed to be effective, such as our human rights policy compliance assessments, COVID has slowed progress.

Responsible recruitment continues to be a priority area for us, and we have invested in this work this year developing materials in Thai to support our supplier partners in Thailand overcoming the barrier that most guidance is in English, which is not accessible to the HR teams who need to implement it. With the support of our Ethical Trade Consultant, and ongoing partnerships with organisations such as IOM we look forward to continuing to meet our targets in this area in 21/22.

We continue to invest in cross industry collaboration as active members of FNET and the SEA Alliance and recognise the importance of working closely with peers, customers and competitors to secure industry level change. We are particularly keen to continue exploring the options for increasing investment in worker voice through FNET and the GSA project on grievance mechanisms on vessels. COVID has shone a light on visibility in international supply chains and while we have benefitted from openness built through long standing relationships with many of our supplier partners, we will be focusing more going forward on accessing direct feedback from workers.

World Wise Foods sustainability strategy “Food for Thought” has embedded our targets focused on human rights across the business, the KPIs set are now aligned within this modern slavery statement, and are reported to myself, and the board quarterly. I look forward to seeing more positive progress over the next year.

World Wise Foods Group Modern Slavery Statement April 2020 – March 2021 was prepared by the Sustainable Sourcing & Ethical Trade Manager and approved by the CEO on behalf of the World Wise Foods Board on June 30th 2021.



John Burton

CEO of World Wise Foods

Chair of the Board of Directors of World Wise Foods & Nature's Finest

30.06.2021

