

Modern Slavery Statement

April 2021 – March 2022



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 sixth 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 2021/22 (ending March 31st 2022). It also includes the plans to further develop this work in 2022/23.

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, sustainable sourcing, product development 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.

We have direct relationships with our supplier partners that produce our finished products, and in some cases we also work directly with raw material suppliers. We work closely with our supplier partners in Africa, South-East Asia, Europe and North America – we have worked with 60% of our supplier partners for over 5 years. We strive for continuous improvement on ethical and sustainability standards within our supply chains.



* Revenue from 01 April 2021-31 March 2022

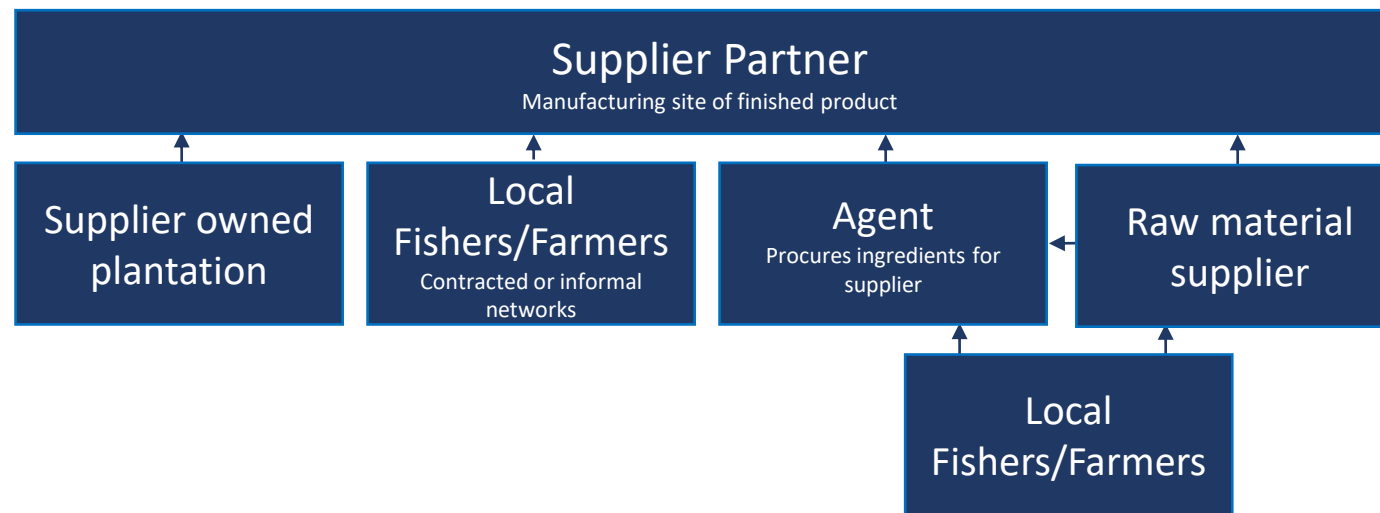
** Our risk scoring process was updated in 20/21, a large proportion of our suppliers are in countries rated as high risk by FNET.

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 our collaboration with customers 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 Chief Executive, Head of Technical, Head of Sustainable Sourcing, Head of Supply Chain 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 met our 19/20 commitment to publish a list of our tier one suppliers and the source of all our fish on our website which we update annually. Our fish sourcing is also shared through the Ocean Disclosure Project.

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 set targets to map all our priority raw materials to source, and have timebound targets in place to mitigate against any identified risks associated with our priority raw materials.

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. All new supplier partners are required to accept before supply commences.

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. It has been updated in 21/22 via a third party review by Impactt.

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 we aim to mitigate 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 hold 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. 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 Head of Sustainable Sourcing 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 they bring 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 Head of Sustainable Sourcing who reports directly to the Chief Executive. The Sustainable Sourcing team also includes 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 outlines KPIs in our sustainability plan “Food for Thought” which links to our approach to managing human rights. While 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

Our supplier partners performance scores, which include ethical criteria, have achieved their target. We have also maintained our target of 100% of World Wise Foods supplier partners acknowledging our Responsible Sourcing Code of Practice by aligning ethical and commercial terms in our new supplier approval process

We have continued to explore risks in our supply chain by mapping our sourcing of our fished and farmed raw materials back to source. We have focused on fish derivatives, wild capture fish and soy in supply chains reaching into Thailand, Indonesia, China and Europe. Mapping the supply base to tier three enables us to understand environmental, human rights and food safety risks and to mitigate these with our sourcing requirements

In 21/22 we had our human rights policy reviewed by external human rights consultancy, Impactt Ltd. This review led to an increased focus on remediation. The external expert review verifies good practice within the policy to suppliers and customers.

We have made “good progress” this year assessing supplier partners against our human rights policy and have met our target to increase compliance by at least 10% each year

Our Human Rights Due Diligence (HRDD) process has been updated, and formally approved by the Board of Directors. Going forward we will be trialling a target based approach where supplier partner Relationship Managers and the Head of Sustainable Sourcing agree targets and share accountability for progress on compliance within the supply base. Progress against targets will be reported to the board quarterly

2. Capacity Building and Training: 21/22

In 21/22 we have provided capacity building and coaching to six supplier partners in SE Asia on responsible recruitment risks and mitigating actions. This has included training and support to deliver action plans. Independent consultant have also helped to identify risk in recruitment channels via worker interviews to ensure new policies address known risks. These interviews have identified risks such as over charging by recruitment agencies, and informal loan schemes between workers who recruit contacts as referrals. Our first supplier partner committed to the employer pays principle, and we remain on track to meet our commitment to address risks in responsible recruitment by 2025

We have supported a supplier partner by providing expert consultant training and industry analysis relating to human rights risks at farm level. Outlining risks and industry expectations has resulted in agreed actions to identify and address risks at farm level in 22/23

In 21/22 we have continued to invest in our suite of training and guidance for supplier partners. Building on our toolkit on responsible recruitment we have also developed training on risk areas such as the value of worker representation, good practice in worker orientation, and training for interpreters who work closely with migrant workers and play a part in resolving any grievances raised.

Completing training at one supplier has led to the inclusion of migrant workers in the worker committee who had previously not seen the value in participation. At another supplier translators roles and responsibilities have been clarified and a community of translators is now being led by HR to ensure they can navigate this challenging role

3. Collaborating for Change: 21/22

In 21/22 our Head of Sustainable Sourcing took on shared responsibility for the Responsible Recruitment Group at the Food Network for Ethical Trade (FNET). This group seeks to support other FNET members to develop and implement responsible recruitment policies in their supply chains

We have continued to collaborate closely with our strategic NGO partners, in particular the International Pole and Line Foundation (IPNLF). In 21/22 we supported the IPNLF to conduct a human rights assessment in one of our supply chains, and to explore the development of technology tools that can deliver effective grievance mechanisms on fishing vessels

In 21/22 we have continued to work collaboratively with our customers – for example to deliver complex policies such as responsible recruitment within our supply base, and in the development of new policies; for example supporting the integration of human rights requirements into seafood sourcing processes

We have continued to support the Seafood Ethics Action Alliance through our membership of their Steering Committee. In 21/22 we have contributed to the development of the Fishery Risk Rating Assessment Tool – a tool being widely adopted in the industry to enable companies to identify high risk fisheries as part of their HRDD processes. We have also supported the development of a fund which will enable companies to collaboratively address human rights risks at vessel level.

Progress on commitments: 2020 – 2023

Commitments for 21/22 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 supplier partners 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 our 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.

COVID has continued to present us with a challenge – 100% of our supply base is outside the UK. However, with restrictions lifting our ethical trade consultant based in Thailand has enabled us to meet our target on areas such as increased compliance to our human rights policy, and to continue implementing essential areas such as embedding responsible recruitment practices.

In 2022 the World Wise Foods Board of Directors approved an updated Human Rights Due Diligence approach reflecting the experience of our ethical team in how progress is being made across our supply base against set objectives. We are now looking to have a target based approach which requires our commercial leads who hold the relationships with our supplier partners to share responsibility for meeting ethical targets in our supply base with the Head of Sustainable Sourcing. This more targeted approach will be delivered using the training materials and coaching techniques that have been successfully identifying and addressing risks in our supply base for the last few years.

Collaboration continues to be important to us as a means of addressing risks we cannot tackle alone, and to invest in whole industry progress. Our work with the SEA Alliance will enable many UK based seafood companies to identify risks in their wild capture supply chains as part of their HRDD approaches. We continue to support the SEA Alliance's advocacy to the Marine Stewardship Council (MSC) to establish more impactful requirements on human rights for MSC certified fisheries in order to address risks for crew on vessels.

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 our respective boards quarterly.

We look forward to seeing more positive progress over the next year.

World Wise Foods Group Modern Slavery Statement April 2021 – March 2022 was prepared by the Head of Sustainable Sourcing and approved by the World Wise Foods CEO, and Nature's Finest Managing Director on behalf of their respective Boards on May 3rd 2022.



David Burton
Chief Executive, World Wise Foods
3rd May 2022



Ian Wingate
Managing Director, Nature's Finest
3rd May 2022

