

MODERN SLAVERY STATEMENT



APRIL 2022 – MARCH 2023

CONTENTS

- Introduction
- Organisation structure and supply chains
- Policies in relation to modern slavery
- Risk assessment and management
- Due diligence processes
- Training on modern slavery
- Key performance indicators
- Plans for 2023 – 24

INTRODUCTION

The UK Modern Slavery Act 2015 (the 'Act') requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their own-operations and supply chains. This is the seventh modern slavery statement produced by the World Wise Foods Group made pursuant to the Act.

Our statement outlines steps taken by the World Wise Foods Group to prevent modern slavery during the financial year 2022 – 23. 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.

The World Wise Foods Group is fully committed to working proactively to understand the modern slavery risks within our own-operations and supply chains and to putting controls in place to mitigate against them. Over the past 12 months we have been able to strengthen our approach, including:

- Enhancing our supplier partners contractual commitments to ensuring and promoting human rights
- Further direct worker engagement through our partnership with Labor Solutions
- Operationalising the Employer Pays Principle at additional sites in southeast Asia

In the year ahead we will continue to develop our approach to managing the risk of modern slavery within our business and supply chains and ensure our strategy continues to respond to changing risks.

This statement was approved by the World Wise Foods and Nature's Finest Board of Directors.

David Burton

Chief Executive, World Wise Foods
July 2023

Ian Wingate

Managing Director, Nature's Finest
July 2023

ORGANISATION STRUCTURE AND SUPPLY CHAINS

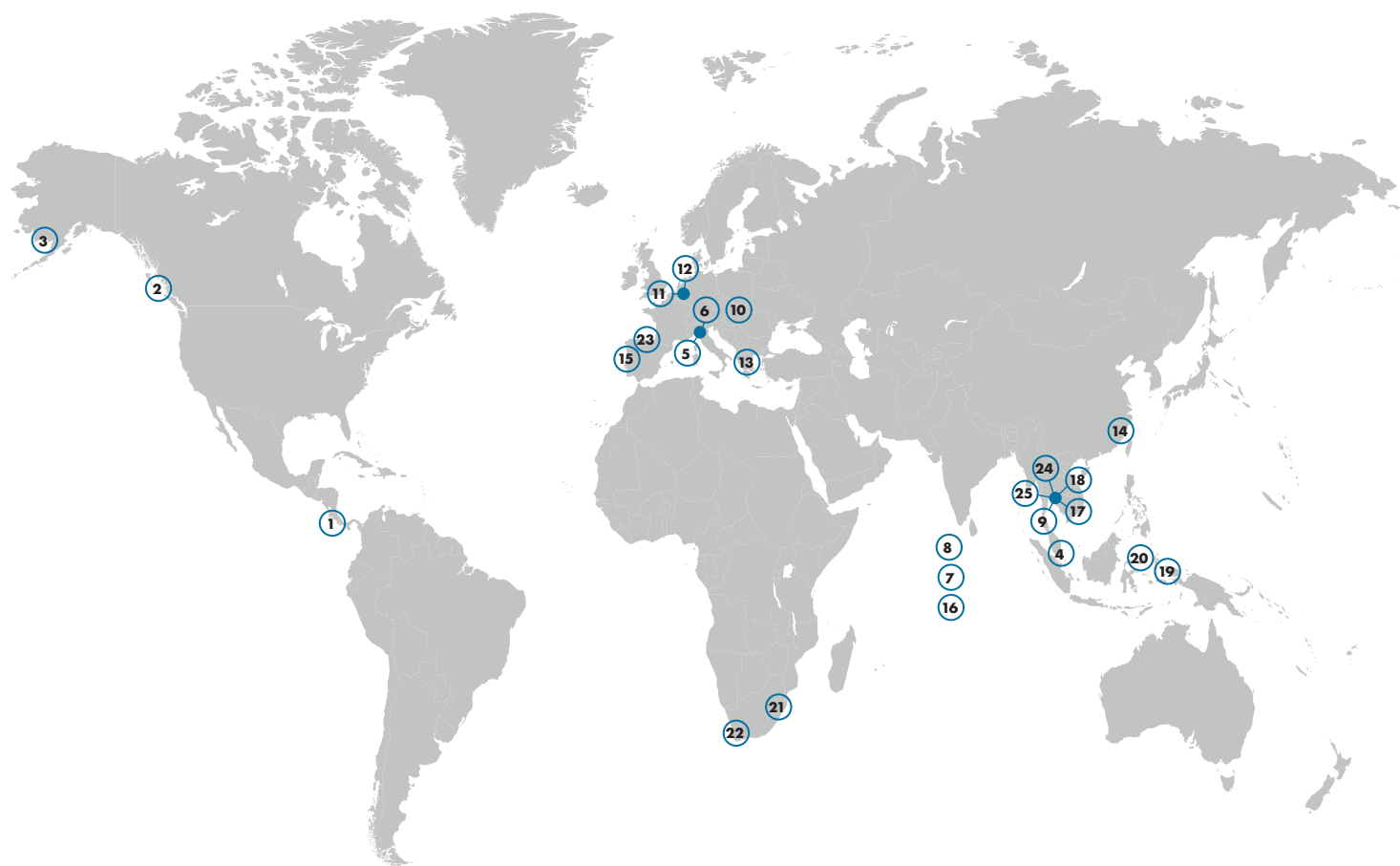
The World Wise Foods Group is made up of three separate business entities. World Wise Foods, Nature's Finest and American Tuna. World Wise Foods has overall responsibility for sustainability for the Group.

World Wise Foods is a distributor supplying private label and branded ambient food products to leading retailers, manufacturers, and food service businesses worldwide ('Customers'). 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, sustainability, product development and technical functions. We also have an office in Thailand 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.

WORLD WISE FOODS AND NATURE'S FINEST SUPPLIER PARTNERS (APRIL 2022 – MARCH 2023)



- | | | | |
|---|--|---|--|
| 1. Planta Alimentos Prosalud
Puntarenas, Costa Rica | 8. Felivaru (MIFCO)
Felivaru, Maldives | 16. Horizon Fisheries Private Ltd
Maandhoo, Maldives | 23. Salica Industria Alimentaria,
S.A.
Bizkaia, Spain |
| 2. Canfisco - AGS Ketchikan
Ketchikan, Alaska | 9. Food & Drink Public Co. Ltd
Chonburi, Thailand | 17. Merit Food Products Co.,Ltd.
Chonburi, Thailand | 24. Siam Food (2513) Company
Ltd.
Chonburi, Thailand |
| 3. Canfisco - AGS Naknek
Naknek, Alaska | 10. Global Green Europe Kft
Hajdú-Bihar, Hungary | 18. MMP International Co. Ltd
Samutsakorn, Thailand | 25. Thai President Foods Public
Co. Ltd BP2
Ratchaburi, Thailand |
| 4. Delisauce
Johor, Malaysia | 11. Greenyard Prepared
Bree, Belgium | 19. PT. Citiraja Ampat Canning
Sorong, Indonesia | |
| 5. Emiliana Conserve Societa'
Agricola S.P.A
Parma, Italy | 12. Greenyard Prepared
Rijkevorsel, Belgium | 20. PT. Samudra
Bitong, Indonesia | |
| 6. Emiliana San Polo | 13. Kouloura Imathias, Veria,
Greece | 21. RFG Eswatini (Pty) Ltd
Malkerns, Eswatini | |
| 7. Ensis Fisheries Private Ltd.
Hulhumale, Maldives | 14. Ningo, Zhejiang, China | 22. Rhodes Foods Fruit Products
Western Cape, South Africa | |
| | 15. Pombal, Portugal | | |

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

- Private label and branded food products developed in collaboration with our Supplier Partners and Customers
- Outsourced support services such as IT, communications, cleaning, product testing, storage, and distribution which we procure directly.

The supply chains of our food products are complex. For example, one of our oriental sauces may contain 30 raw

materials from 24 suppliers located across 5 countries. In addition to direct suppliers, raw materials may also come from supplier-owned farms and plantations, local farmers or fishers, or via agents. We have prioritised mapping the supply chains of our priority raw materials – see page 12 of our sustainability report '[Food For Thought](#)' for further information. In some cases World Wise Foods purchases the raw material (whole round fish) for delivery and processing to supplier partners.

World Wise Foods disclose publicly their list of supplier partners and sourcing fisheries annually. This data for 2022 -23 can be accessed [here](#).

43
employees

349
product
lines

19,000 +
workers in our
tier 1¹ supply
chain

15
sourcing
countries

¹ We define tier 1 as the sites where final manufacturing occurs



POLICIES IN RELATION TO MODERN SLAVERY

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.

The two key policies applicable to all supplier partners which demonstrate and monitor these commitments are:

Responsible Sourcing Code of Practice:

This policy outlines the standards all our supplier partners are expected to meet. It includes a requirement to comply with the ETI base code, which states employment must be freely chosen, and monitoring via ethical audits. All new supplier partners are required to sign the code of practice before supply commences.

Human Rights policy:

This policy outlines our expectations relating to ensuring and promoting human rights. It identifies the most vulnerable groups within our supply chains and provides detailed requirements relating to each. This includes those most at risk of falling victim to modern slavery – migrant workers, children and young workers. The policy also forms a framework for us to assess supplier partners, through a gap analysis, and subsequently drive continuous improvement.

For our own operations we also have several policies that promote human rights including our 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 also has an Employee Working Group and gathers worker feedback through an annual employee engagement survey.

GOVERNANCE

World Wise Foods Chief Executive and Nature's Finest Managing Director have overall responsibility for ensuring both businesses meet their human rights commitments. The Board of Directors for both companies also hold this responsibility. Working in collaboration with senior managers and supplier partners, delivery of our human rights policies and procedures is led by the Head of Sustainability who reports directly into the World Wise Foods Chief Executive.

All policies and procedures are approved by World Wise Foods and Nature's Finest respective Chief Executive, Managing Director and Boards of Directors alongside relevant members of the Senior Management Team. Progress against agreed objectives is reported quarterly to senior managers and World Wise Foods and Nature's Finest board members. World Wise Foods progress is also reported publicly against human rights key performance indicators in our annual sustainability report.

RISK ASSESSMENT AND MANAGEMENT

We conduct a Supplier Partner Human Rights Risk assessment bi-annually. This score reflects:

- Country risk (as determined by the FNET country risk ratings)
- Type of labour used (seasonal, permanent, agency or migrant)
- Ethical performance in their most recent ethical audit
- Knowledge of supplier partners capability and capacity

The scores determine which supplier partners we prioritise engaging on human rights issues; this list is typically dominated by those in high-risk countries. For World Wise Foods the scores determined by the Supplier Partner Human Rights Risk assessment also feed into the quarterly Supplier Partner Performance Scores reported to the World Wise Foods Board of Directors.

We gather insights on emerging risks through our engagement with relevant multi-stakeholder initiatives and country-level partnerships. Campaigners, activists, and whistle-blowers can also play an important role in helping us identify where some of the biggest risks lie. We also capture the views of workers through direct workers engagement including informal conversations, interviews, and worker surveys.

DUE DILIGENCE PROCESSES

Our Human Rights due diligence approach outlines the ongoing risk management process we follow to identify, prevent, mitigate

and account for how we address adverse human rights impacts connected to our business. The outputs of our due diligence (the steps taken to actively manage risk) for 2022- 23 is summarised below.

Compliance

In early 2023 we updated the World Wise Foods purchase contract template to better reflect our requirements related to human rights. This ensures that commercial functions are aware of our expectations prior to supply. The template, which will be used for all contracts going forwards, now states:

Strict adherence to the World Wise Foods Responsible Sourcing Code of Practice (RSCOP) is a condition of all supply to World Wise Foods. Where critical or significant non-compliance or Human Rights allegations are identified the Buyer reserves the right to suspend, delay and ultimately cancel this purchase contract with no right of recourse for the Seller if satisfactory and timely action or progress is not taken by the Seller in relation to the breach.

We monitor compliance with the ETI Base Code through our ethical compliance programme. 68% of our active supplier partners were audited in the last 12 months. Only two non-conformances were raised under the category 'Employment is Freely Chosen'. Both non-conformances related to the payment of recruitment fees by workers. We continue to work closely with all our supplier partners to ensure timely closure of non-conformances raised in audits.

We also monitor compliance with our Human Rights policy by conducting a gap analysis 1:1 with all supplier partners. This exercise involves direct conversations with HR teams



and workers as well as a review of relevant policies and procedures. To date, we have completed a gap analysis with 47% of supplier partners with an average compliance rate of 78%.² Our target for 2023 – 24 is to have assessed 70% of

supplier partners. There are several clauses within this policy that mitigate the risk of modern slavery. Progress towards 100% compliance with these clauses is outlined below.

Clause(s)	Number of clauses	% compliance ³
No worker should pay for a job.	1	100%
Overtime must be voluntary in principle and practice. [...] There must be no negative implications for refusing to work overtime.	1	100%
Workers must be free to choose to live in private accommodation or accommodation provided by employers (where available). Workers freedom of movement must not be restricted.	1	100%
All workers must work free from harassment; the use of violence, threat or intimidation of any kind is strictly prohibited. [...]	1	88%
All workers must be able to terminate their employment with reasonable notice (as specified in their contract) without penalty.	1	100%
Freedom to change employment must be respected and legal requirements followed.	1	100%
Migrant Workers are protected.	47	82%
Child Labour is prevented and Young Workers are protected.	9	99%

Direct Worker Engagement

Recognising the importance of amplifying worker voice, direct worker engagement is a key area of focus under our Human Rights approach.

All audits conducted under our ethical compliance programme include worker interviews. All interviews include questions related to freedom of movement and responsible recruitment. We continue to engage directly with Sedex and 3rd party audit bodies to enhance the quality of auditing in relation to responsible recruitment. In 2022-23 we also conducted our own worker interviews, using independent translators, at three sites specifically focused on recruitment fees and costs – further information below.

Effective worker representation not only enables employers and employees to communicate, consult and negotiate effectively with each other but also provides an effective avenue through which workers can raise issues, including any concerns related to modern slavery. This year to support both workers and our supplier partners, we trained management and worker committee members at four sites in Thailand on their roles and responsibilities.

This year in collaboration with Labor Solutions we also piloted worker satisfaction surveys at five sites in Asia. Utilising an

independent facilitator and translators, we were able to engage over 1,000 workers, representing over 25% of the workforce per site. The survey included questions related to withholding of wages and excessive overtime, both of which are forced labour indicators. Across all 5 sites 92% of respondents agreed⁴ 'My pay and payslip is always correct' and 85 % that 'I can chose whether or not to do overtime.' We are now working with all sites to agree follow-up actions to further improve working conditions.

Delivering Responsible Recruitment in Southeast Asia

Responsible recruitment is also a key area of focus under our Human Rights approach. This is because recruitment fees and costs, which can lead to debt bondage, are the most common modern slavery indicator in our supply chains. This also aligns with the broader commitment to provide decent, fair and safe work to all. Decent work starts with responsible recruitment.

Recognising that the risk of recruitment fees and costs occurring is greatest where migrant workers are used, we have prioritised engaging our supplier partners in the Maldives, Malaysia and Thailand, where the reliance on a migrant workforce is greatest. We are committed to supporting all our supplier partners to implement responsible recruitment principles, including the Employer Pays Principle (EPP)⁵. Over the past 12 months this has included:

² Where >75% of clauses have been reviewed

³ Average % compliance across all supplier partners that have been assessed

⁴ 'Strongly Agree' or 'Agree'

⁵ We align with the ILO [definition](#) of recruitment fees and costs

- Conducting worker interviews to better understand migrant workers experiences during the recruitment process including the payment of any fees or costs and the how much information they had on their future role pre-departure
- Supporting supplier partners ensure the ability to implement responsible recruitment is a consideration during the tender process for new recruitment agencies
- Providing templates for key documents such as responsible recruitment policies, pre-departure training and service level agreements

- Working with trusted 3rd parties to verify supplier partners compliance with EPP

Implementing EPP is complex and we recognise that some of our supplier partners are on a journey towards compliance. In line with our commitment to transparency, we will share the progress of our Southeast Asian supply base annually going forwards.

Where suppliers have committed to EPP but we identify gaps in implementation, we will also support supplier partners to deliver remedy to workers, including the repayment of fees and costs.

See page 8 of 'Food For Thought' for further information on individual supplier progress in implementing EPP.

BRAG	Status	No. Suppliers in Southeast Asia
	Verified via independent 3 rd party as compliant with the EPP	3
	Full commitment to the EPP	2
	Partial commitment to the EPP	2
	No commitment to the EPP	0

Collaborating for Change

We recognise the importance of working transparently and collaboratively to address complex human rights risks. This year we have played an active role in a number of multi-stakeholder initiatives (MSI's) in order to further progress industry action to tackle modern slavery.

FNET Responsible Recruitment Working Group

Our Head of Sustainability continues to lead the FNET Responsible Recruitment Working Group, a space for sharing knowledge and insights on responsible recruitment and remediation approaches. In the past 12 months the group has focused on mapping recruitment supply chains and identifying risks and mitigating actions at each stage. World Wise Foods is committed to sharing our own learnings from implementing EPP in this group and supporting others on their responsible recruitment journey.

Seafood Ethical Action (SEA) Alliance

The SEA Alliance is a pre-competitive collaboration of retailers and seafood businesses aiming to strengthen human rights due diligence carried out in the global seafood supply chain and ensure respect for human rights. This year World Wise Foods, alongside IPNLF and Sainsbury's, was a recipient of SEA Alliance funding – further details on this project can be found below.

Our Head of Sustainability has also been working closely with the Head of SEA Alliance to develop a proposal for a study

into recruitment practices and recruitment fees and costs in the global tuna processing sector. This will include reviewing the extent to which commitments to EPP by both MSI's and buyers are being successfully implemented and the barriers to further progress. The study is due to commence in Summer 2023.

International Pole and Line Foundation (IPNLF)

In 2022 World Wise Foods part-funded the IPNLF to conduct a social assessment of the Maldives fishery. Through interviews with fishers (including a representative sample of migrant fishers), skippers and key informants, we have been able to gain greater insights into recruitment and employment practices. The survey also included questions that would highlight modern salary indicators, such as passport retention. The fieldwork was concluded in April 2023 with the results and next steps now due to be shared and discussed with government and industry. Our ultimate ambition is for effective vessel standards including third party grievance mechanisms to be in place across all tuna vessels in our supply chains as we believe this will help prevent the risk of modern slavery and labour exploitation on vessels. In line with this and in partnership with the IPNLF and Sainsbury's, in 2022 we received funding from the SEA Alliance 'Change on the Water Fund'. Our joint project aims to support the development of a national grievance mechanism in the Maldives as well as developing additional resources to support migrant workers both prior to and during their time in the Maldives.

TRAINING ON MODERN SLAVERY AND TRAFFICKING

All World Wise Foods colleagues are required to complete modern slavery training as part of their induction to the business. 100% of colleagues have completed this training.

We also continue to work 1:1 with our supplier partners to provide training tailored to their needs. For example, in early 2022 we provided modern slavery training to the HR team of our canned tuna supplier in the Maldives. This provided important context for the need to embed responsible recruitment principles within their business. In the past 12 months we have

also provided responsible recruitment capacity building to three supplier partners – further information above.

KEY PERFORMANCE INDICATORS (KPI'S)

In our most recent annual sustainability report 'Food For Thought' we launched new KPI's for 2023 to 2026, including four under the theme 'Promoting Human Rights.' Progress against these KPI's will be reported annually.

In our Modern Slavery statement going forwards, we will also share the data for the below metrics.

Measure	Status 2022 – 23
% of colleagues training on modern slavery	100%
Number of human rights allegations with modern slavery indicators	0
Number of human rights allegations with labour abuse indicators	1
Number of non-conformances raised used the category 'Employment is freely chosen'	2
% of supplying sites where migrant workers are used	55%
% of supplier partners in Southeast Asia committed to EPP	71%
% of priority supplier partners ⁶ where direct worker feedback ⁷ has been obtained (excluding via ethical audits)	46%

PLANS FOR 2023 – 24

In the next 12 months we will continue to review and evolve our approach to managing the risk of modern slavery within our own-operations and supply chains. We will act immediately to address any concerns identified.

Our key priorities are:

- Completing a desk-based human rights risk assessment for fisheries
- Further direct worker engagement with priority supplier partners
- Updating our mandatory Human Rights induction training to ensure it reflects both emerging risks and our enhanced approach to due diligence
- Reviewing farm level due diligence within our tomato supply chain
- Piloting enhanced due diligence at farm level in our coconut milk supply chain
- Completing verification of effective implementation of the Employer Pays Principle at two factories in Southeast Asia
- Engaging our 3rd party logistics UK warehouse on modern slavery risks

⁶ Active supplier partners that rate between 7 – 10 in our Supplier Partners Human Rights Risk Assessment

⁷ Independent worker interviews or a worker satisfaction survey



5 Queens Square, Ascot Business Park,
Lyndhurst Road, Ascot, SL5 9FE,
United Kingdom

Tel: +44(0) 1344 356969

Email: Enquiries@worldwisefoods.co.uk