

MODERN SLAVERY STATEMENT



APRIL 2023 – MARCH 2024

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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 2023 – 24. 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:

- Direct worker engagement through our partnership with Labor Solutions and worker interviews
- Further operationalising the Employer Pays Principle at sites in Southeast Asia
- Updating our mandatory modern slavery training

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 2024

Ian Wingate

Managing Director, Nature's Finest
July 2024

ORGANISATION STRUCTURE AND SUPPLY CHAINS

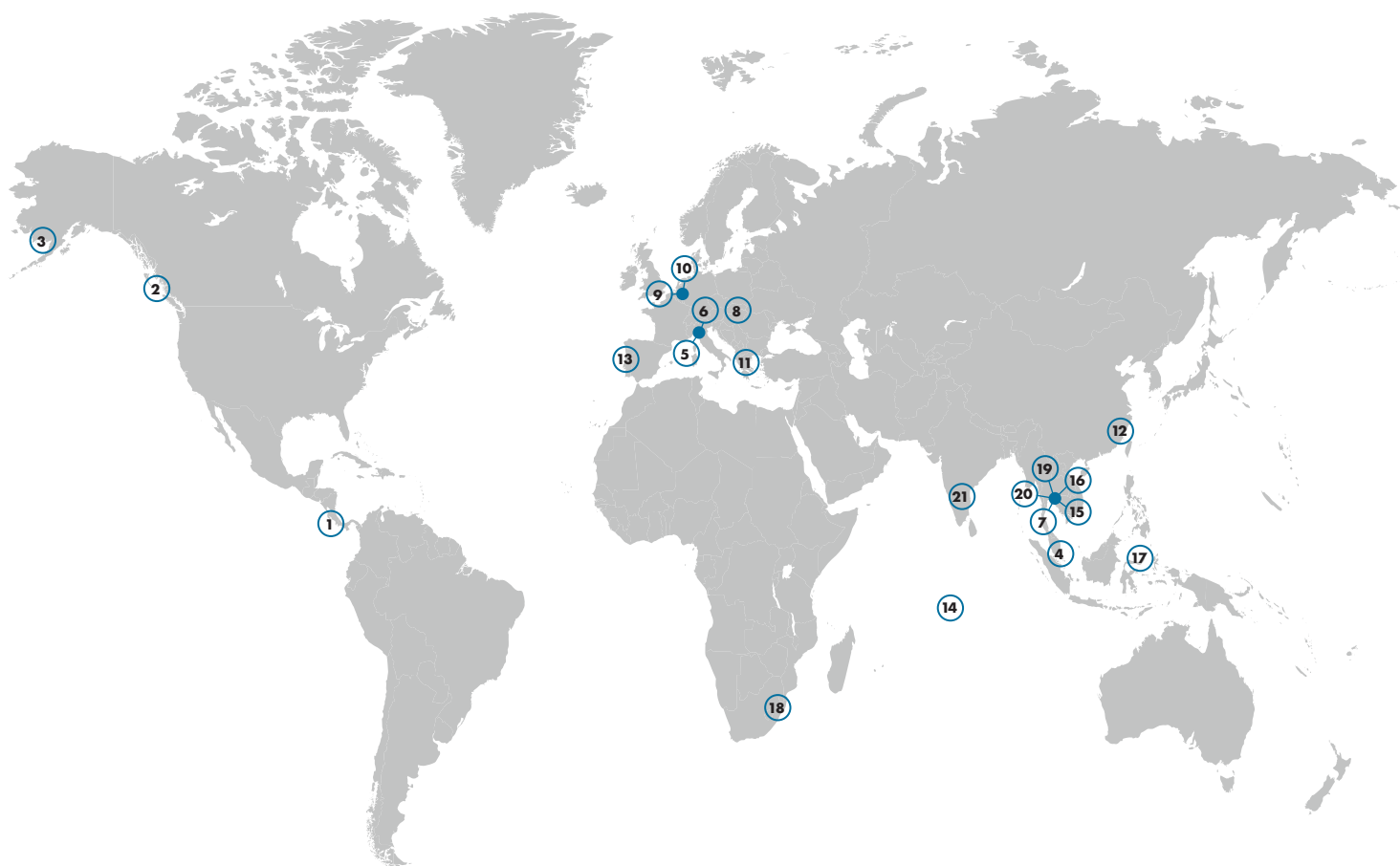
The World Wise Foods Group is made up of three separate business entities. World Wise Foods, Nature's Finest and American Tuna. World Wise Foods has overall responsibility for sustainability for the Group.

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. 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 | 7. Food & Drink Public Co. Ltd Chonburi, Thailand | 12. Ningo, Zhejiang, China | 18. RFG Eswatini (Pty) Ltd Malkerns, Eswatini |
| 2. Canfisco - AGS Ketchikan Ketchikan, Alaska | 8. Global Green Europe Kif Hajdú-Bihar, Hungary | 13. Pombal, Portugal | 19. Siam Food (2513) Company Ltd., Chonburi, Thailand |
| 3. Canfisco - AGS Naknek Naknek, Alaska | 9. Greenyard Prepared Bree, Belgium | 14. Horizon Fisheries Private Ltd Maandhoo, Maldives | 20. Thai President Foods Public Co. Ltd BP2 Ratchaburi, Thailand |
| 4. Delisaucce, Johor, Malaysia | 10. Greenyard Prepared Rijkevorsel, Belgium | 15. Merit Food Products Co., Ltd. Chonburi, Thailand | 21. Global Green Oblapura, Bangalore, India |
| 5. Emiliana Conserve Societa' Agricola S.P.A Parma, Italy | 11. Kouloura Imathias, Veria, Greece | 16. MMP International Co. Ltd Samutsakorn, Thailand | |
| 6. Emiliana San Polo | | 17. PT. Samudra Bitong, Indonesia | |

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 16 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 2023 -24 can be accessed [here](#).

47
employees

311
product
lines

12,600 +
workers in our
tier 1¹ supply chain

14
sourcing
countries

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

21
Supplier
Partners



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 on these. World Wise Foods also has an Employee Working Group that meets quarterly and gathers worker feedback through an employee engagement survey annually.

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 quarterly. 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 worker 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 2023- 24 is summarised below.

Compliance

In early 2024 we updated the World Wise Foods and Nature's Finest Responsible Sourcing Code of Practice to ensure it continues to remain fit for purpose. All supplier partners have been asked to sign this new version to demonstrate their on-going commitment to the principles outlined. This includes a commitment to ensuring employment is freely chosen, all overtime is voluntary and adherence with the 'Employer Pays Principle'.

We monitor compliance with the ETI Base Code through our ethical compliance programme. 76% of our active supplier partners were audited in the last 12 months. 5 non-conformances were raised under the category 'Employment is Freely Chosen'. 4 of the non-conformances are related to the payment of recruitment fees by workers and 1 was raised for inadequate training on voluntary overtime. Further detail on our work on this topic can be found under 'Delivering Responsible Recruitment in Southeast Asia'. We continue to work closely with all our supplier partners to ensure timely closure of all 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 69% of World Wise Foods supplier partners and 50% of Nature's Finest supplier partners. The average compliance rate is 75% and 79% respectively ². This year we also conducted a review with two prospective Nature's Finest suppliers. Our target for 2024 – 25 is to have assessed 75% of World Wise Foods and Nature's Finest supplier partners.

2 Where >75% of clauses have been reviewed



There are several clauses within the policy that mitigate the risk of modern slavery. Progress towards verifying 100%

compliance with these clauses for World Wise Foods is outlined below.

Clause(s)	Number of clauses	% compliance ³
No worker should pay for a job.	1	70%
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	90%
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	94%
Child Labour is prevented and Young Workers are protected.	9	100%

We recognise the limitations of audits in detecting modern slavery indicators and take a 'beyond compliance' approach across our supply chains. Examples as below:

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. We continue to engage directly with Sedex and 3rd party audit bodies to enhance the quality of auditing in relation to responsible recruitment. In 2023-24 we also conducted our own worker interviews, using independent translators, with nine supplier partners. All 3rd party and in-house interviews included questions on freedom of movement and recruitment fees and costs.

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 extended our training of worker committee members to our supplying site in Malaysia.

This year in collaboration with Labor Solutions we continued to deploy worker satisfaction surveys at five sites in Asia. Utilising

an independent facilitator and translators, we were able to engage 719 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. We have seen a 13% improvement in scores across all sites compared to 2022 -23 results.

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)⁴. In the past 12 months, two of our supplier partners in Thailand have committed to cover additional fees and costs associated with recruitment that would have otherwise been covered by workers.

Recognising that risks are dynamic, we continue to conduct

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

⁴ We align with the [ILO definition](#) of recruitment fees and costs

regular worker interviews to better understand migrant workers experiences during the recruitment or document renewal process, including understanding where fees or costs have been paid. All interviews are conducted by an independent 3rd party and, where required, supported by an independent translator. Through worker interviews in our Thai supply base we have detected an emerging risk of recruitment fees and costs being paid by 'walk-in' migrant workers via the informal broker system. We have shared and discussed these insights with our supplier partners to enable them to effectively review and enhance the processes in place to enable workers to be recruited directly whilst preventing the use of intermediaries. In 2024, in consultation with key stakeholders,

we intend to publish guidance on walk-in recruitment to further enable the sharing of best practices across sites.

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 continue to share the progress of our Southeast Asian supply base annually.

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.

BRAG Status	No. Suppliers in Southeast Asia
Verified via independent 3 rd party as compliant with the EPP	3
Full commitment to the EPP	1
Partial commitment to the EPP	2
No commitment to the EPP	0

Payment of wages

This year we have taken additional steps in key sourcing countries to ensure that salaries are paid on time and in full for all hours worked, including overtime premiums where relevant. We do this because we know how important it is for workers, and because ensuring workers are not in debt means they are less vulnerable to any risk of forced labour. Through our own checks, we occasionally find cases where salaries are not paid on time and/or in full. Where we identify a shortfall in payment, we work with suppliers to ensure pay back of any missed wages. Through this process we identified one current and two prospective supplier partners sites, affecting 294 workers, where payments had fallen short of what should have been paid, including premiums for overtime. These were subsequently rectified with a total of 2,789 hours repaid to workers as result of our work.

Fisher welfare

We recognise that the risk of modern slavery may be greater beyond our supplier partner's sites and further down the supply chain. In our seafood supply chains, we ensure full visibility back to, at minimum, a group of vessels. This year we have sought to enhance our visibility of working conditions on vessels, at port side and cold stores within our tuna supply chain. This has included obtaining visibility of any ethical audits conducted at cold stores, visiting an example cold store in the Maldives, and visiting the South African albacore fishery. This exercise has enabled us to better understand the risks at lower tiers of the supply chain and support the resolution of any issues raised. We now intend to increase our engagement with the American albacore fishery.

This year we reassessed all our fisheries using the SEA Alliance Fishery Risk Tool. This uses data from several indices and ratings systems to produce a high-level baseline assessment of human rights risks. The focus for assessment is human trafficking, forced labour, and child labour, no significant concerns were raised.

Further detail on our work to promote human rights in the Maldives fishery can be found below.

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. World Wise Foods is committed to sharing our own learnings from implementing EPP in this group and supporting others on their responsible recruitment journey. This year, in collaboration with other multistakeholder initiatives, we have led on a 'Study into the implementation of responsible recruitment practices and the Employer Pays Principle (EPP) in the global tuna processing sector.' This is due for publication in Summer 2024.

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. World Wise Foods is a member of the advocacy working group which seeks improved regulation and enforcement to accelerate improvements in human rights and labour standards for workers. This year the group has continued to engage with the Marine Stewardship Council (MSC) to strengthen the labour aspects of the MSC Standard, engaged governments of key source countries encouraging the ratification of relevant legislation, and conducted a review of our strategy in collaboration with strategic partners.

International Pole and Line Foundation (IPNLF)

This year we have continued our collaboration with IPNLF Maldives as we seek to further promote human rights on vessels. Although a change in government in 2023 has stalled progress with the launch of a National Grievance mechanism, we have developed a migrant worker information document containing key information of relevance to migrants both prior to departure and during their time in the Maldives. This document was developed in consultation with key stakeholders including government departments and migrant workers already in the Maldives. We are now awaiting feedback from the new government ahead of its publication.

TRAINING ON MODERN SLAVERY

All World Wise Foods colleagues are required to complete both human rights and modern slavery training as part of their induction to the business. This year we updated both trainings to ensure they continue to remain fit for purpose. In March 2024, all World Wise Foods colleagues were required to attend the updated modern slavery training with 100% of colleagues now re-trained.

Recognising the heightened risk of modern slavery in UK warehouses, this year our nominated UK warehouse⁵ has now attended the new 'Tackling Labour Exploitation in UK Warehousing Modern Slavery training' delivered by Stronger Together.

KEY PERFORMANCE INDICATORS (KPI'S)

Our annual sustainability report 'Food For Thought' outlines progress under the theme 'Promoting Human Rights.' Progress against these KPI's will be reported annually.

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

Measure	2022 - 23	2023 - 24
% of colleagues training on modern slavery	100%	100%
Number of human rights allegations with modern slavery indicators	0	0
Number of human rights allegations with labour abuse indicators	1	0
Number of non-conformances raised used the category 'Employment is freely chosen'	2	5
% of supplying sites where migrant workers are used	55%	38%
% of supplier partners in Southeast Asia committed to EPP	71%	71%
% of priority supplier partners ⁶ where direct worker feedback ⁷ has been obtained (excluding ethical audits)	46%	57%

5 The warehouse selected by World Wise Foods to store product until it delivered to final customer. In some instances, we use customer nominated warehouses.

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

PLANS FOR 2024 - 25

- Conducting a review of migrant worker welfare at a supplier partner site in Europe
- Conducting worker committee training at a supplier partner site in Europe
- Continue to monitor working hours and wages of supplier partners in key sourcing countries
- Extending our new modern slavery training to Nature's Finest colleagues
- Increasing engagement with the American albacore fishery
- Further promoting human rights at vessel level in the Maldives



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