



## MODERN SLAVERY STATEMENT

### INTRODUCTION

CSL welcomes the requirements of Section 54 of the UK Modern Slavery Act 2015 and works towards better strategic understanding of the risks and impacts of our core organisational activities in relation to human rights as we continue to operationalise the UN Guiding Principles on Business and Human Rights.

This statement sets out what steps have been taken to prevent, detect and respond to the threat of modern slavery within our business and supply chain, and the actions we intend to take in order to move closer to our ultimate goal of helping to eliminate modern slavery within this sector.

### OUR ORGANISATION, STRUCTURE AND SUPPLY CHAIN

CSL is 100% owned by Nippon Suisan (Europe) B.V which is based in the Netherlands.

We source fish from a global network of suppliers in Iceland, Norway, UK, South Africa and North America, and are committed to understanding our supply chains from “sea to store.”

We accept production items from over 20 countries, have approximately 100 suppliers and employ approximately 200 staff, in addition to using recruitment agencies for the permanent and temporary provision of labour in line with business requirements.

The Company’s Technical specialists operate and maintain a detailed supply chain map which identifies worker welfare risks at every stage of the process.

### POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

CSL’s Human Rights strategy begins with a commitment to respect international human rights standards, set out at the highest level within the International Bill of Human Rights and the International Labour Organisations (ILO) Declaration on Fundamental Principles and Rights at Work.

We use our internal policies and procedures to filter down and apply these internationally recognised standards, which in turn provide a robust set of rules that all key stakeholders, from its personnel, business partners and other relevant parties, are expected to adhere to. Policies currently in place to help detect, prevent and remedy forced labour:

1. Human Rights Policy
2. Tackling Hidden Labour Policy
3. Recruitment Policy
4. Working Time Policy
5. Anti-Bribery and Corruption Policy
6. Whistleblowing Policy

CSL has additionally asked all suppliers to provide any company policies or communication relating to slavery and human trafficking.

## DUE DILIGENCE & IDENTIFICATION, PREVENTION AND MANAGEMENT OF RISK

The salient human rights risks within the Caistor Seafoods operation have been identified and include; discrimination, fair wages, forced labour, freedom of association, harassment, health & safety, working hours and child labour.

As an A/B member of SEDEX, we invite an independent auditing body to carry out a biennial Sedex Members Ethical Trade Audit (SMETA).

Our current ethical compliance management system is designed around the ETI Base Code. Each clause within the ETI Base Code is included, with current systems audited, a gap analysis conducted, and corrective actions recorded.

As members of Stronger Together, we aim this year to make use of the Stronger Together 'Employer good practice to identify and deter hidden labour exploitation' checklist which provides a range of good practice operational and management processes that may be implemented by employers to deter hidden labour exploitation and / or identify issues at an early stage. This will enable the HR Team to provide a detailed bi-annual report to senior business leaders in order to improve communication, transparency and support in mitigating our identified salient issues.

We intend to ask our labour providers to complete the same checklist, entitled 'Labour provider good practice to identify and deter hidden labour exploitation'.

A labour provider audit is conducted bi-annually. The audit has been written in line with the ETI Base code, with specific sections related to the recruitment and induction process, identity checks, employment is freely chosen, freedom of association, young workers, wages, working hours, grievance procedures, housing, transport and worker interviews.

All labour providers are licenced by the Gangmasters and Labour Abuse Authority (GLAA).

## EFFECTIVENESS, MEASURED AGAINST APPROPRIATE KPI'S

While there has been no clear identification of where the business models KPI's may cause or contribute to modern slavery, the supply chain mapping system works to identify where possible risks to employee welfare may occur. Proposed new modern slavery KPI's are:

1. All frontline Managers, particularly those involved in the recruitment and onboarding of new employees trained to identify and respond to signs of forced labour by January 2020,
2. Implementation and 100% agreement to the CSL Recruiter Compliance Principles from all internal and external parties responsible for the recruitment of new employees by January 2020,
3. Verify 100% supplier commitment to tackling modern slavery in compliance with the Modern Slavery Act 2015, i.e. a statement endorsed at the highest level to demonstrate senior management commitment.
4. Engaging with external charities in order to create a culture that supports staff to be open about their mental health and wellbeing

## TRAINING AND CAPACITY BUILDING

We pledge that human rights abuses will not occur within our business or supply chain as a result of insufficient knowledge or understanding of Modern Slavery, and therefore commit to providing training at all levels of the business.

While there is not currently planned training on the subject of modern slavery and human trafficking, we commit to building it into our established training matrixes, inductions and performance management.

Peter Williams  
**Chief Executive Officer**