



MODERN SLAVERY ACT 2015: SLAVERY AND HUMAN TRAFFICKING STATEMENT 2018

John West Foods Ltd (**John West**) is committed to improving its practices to combat slavery and human trafficking. This statement describes the activities undertaken by John West as a subsidiary of Thai Union Group PCL (**Thai Union**) to prevent, detect and remedy violations of human rights, particularly modern slavery and forced labour within its operations and supply chains. For reference the Modern Slavery Act Statement for Thai Union Group can be accessed here:

<https://www.thaiunion.com/files/download/sustainability/policy/UK-Modern-Slavery-Act-Statement-2018.pdf>

Group structure

John West is an importer and distributor of canned seafood in the fast-moving consumer goods industry. Thai Union has its head office in Samutsakorn, Thailand. The Group has over 49,000 employees worldwide and operates across Europe, Asia, Africa and North America including in the UK, Ireland, France, Netherlands, Africa, the Seychelles and Thailand.

Thai Union Group has a global annual turnover in excess of THB 135 billion (£3.5 billion).

As a subsidiary of Thai Union John West applies and observes Thai Union policy and practice in relation to the UK Modern Slavery Act 2015.

The John West business

Headquartered in Liverpool, England, and with offices in Dublin and Utrecht, John West employs more than 100 people and has an annual turnover of over £185 million.

Our supply chains

John West sources from 5 main categories of seafood: tuna, salmon, sardine, mackerel and cephalopod. Thai Union is a primary processor. Neither Thai Union nor John West own any fishing vessels and Thai Union only own a very small proportion of the aqua culture farms that form part of John West's operations or supply chain. Seafood raw materials are therefore sourced from suppliers from oceans and aquaculture operations around the world. In addition to seafood raw materials we also source a variety of food ingredients, packaging materials and logistics services from suppliers based in our countries of operation.

Our policies on slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Business Ethics and Labor Code of Conduct reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to prevent slavery and human trafficking from taking place anywhere in our supply chains.

Due diligence processes for slavery and human trafficking

The [Thai Union Human Rights Due Diligence Framework](#) details our statement and policies on human rights. All of our policies on human rights, including modern slavery and human trafficking, and broader sustainability areas are guided by SeaChange®-[SeaChange](#), the Thai Union sustainability strategy designed to deliver real and lasting changes in the way we operate in the wider Thai and global fishing industries. This is an integrated plan of initiatives organised into 4 programmes, one of which is “Safe and Legal Labor” aiming to provide safe, legal and freely chosen employment in our own facilities and supply chains. Our strategy therefore aims to eliminate a wide range of unethical labour practices, and not just modern slavery and human trafficking.





The 2020 milestones under the “Safe and Legal Labor” pillar are as follows:

- We will treat all workers, whether migrant or local employees, fairly and with dignity. They will have safe and freely-chosen employments.
- Our supply chains, from vessel to factory, will comply with labour regulations and our Business Ethics and Labour Code of Conduct.
- With full traceability of all the seafood we purchase, we will have information about the labour practices on board vessels.
- Through education and open dialogue, we will empower our workers, giving them a voice today and in the future.
- We are committed to leading an ongoing and active dialogue with industry, government and civil society to ensure lasting improvements in labour practices across the entire industry.

We have in place systems to:

- Identify and assess potential risk areas in our supply chains, including those parts of the business that may be vulnerable to slavery and human trafficking
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

Supplier adherence to our values

Identification of human rights risks, including modern slavery and forced labour, in our operations and supply chains is a critical pillar of Thai Union’s overall Human Rights Due Diligence Framework ([Thai Union Human Rights Due Diligence Framework](#)). To ensure all those in our supply chain and contractors comply with this framework we have in place a rigorous supply chain compliance programme across Thai Union. In John West all suppliers are asked to sign up to acknowledge and accept the Thai Union [Business Ethics and Labour Code of Conduct \(COC\)](#). In doing this they are committing to comply with the mandatory requirements for conducting business with John West which include:

1. Business being conducted lawfully and with integrity
2. Work conducted on the basis of freely agreed and documented terms of employment with legal compliance
3. All workers are treated equally and with respect and dignity
4. Work is conducted on a voluntary basis with no forced or compulsory labour
5. All workers are of an appropriate age
6. All workers are paid fair wages
7. Working hours for all workers are reasonable



8. All workers are free to exercise their right to form and/or join trade unions and bargain collectively where permitted by law
9. Workers health and safety are protected at work
10. Workers have access to fair procedures
11. Business is conducted in a manner that embraces sustainability and reduces environmental impact.

Suppliers who fail to adhere to our Code of Conduct and engage in unfair and illegal labour practices will be asked to provide a time-bound remedial plan or may have their contracts terminated.

Policies on Modern Slavery, Human Trafficking and Human Rights

Thai Union issued the following policies to support the achievement of milestones on human rights under our SeaChange® Strategy:

Human Rights Policy

Launched in 2018, the [Human Rights Policy](#) states the commitment to use our commercial leverage and leadership role to address human rights issues not just in our value chain but also in the wider global seafood industry. In line with the [Business Ethics and Labour Code of Conduct \(COC\)](#), the Human Rights Policy re-iterated our commitment to respect universal human rights, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Business Ethics and Labor Code of Conduct (CoC)

Launched in 2015 the [Business Ethics and Labour Code of Conduct \(COC\)](#) embodies our commitment to conduct business with integrity, openness and respect for universal human rights and core labour principles throughout our operations. This code is applicable to all John West and Thai Union employees, suppliers and sub-suppliers employed by primary suppliers in business with Thai Union.

In particular the Code states:

- “All laws and regulations are complied with in the countries in which the supplier operates.”
- “Forced labour, whether in the form of indentured labour, bonded labour or other forms, is not acceptable. Mental and physical coercion, slavery and human trafficking are prohibited.”

In 2018 Thai Union published a separate [Supplier Business Ethics and Labour Code of Conduct](#). The Suppliers CoC shares the same common principles with the previously issued CoC, but focusses in more detail on supplier requirements, particularly with respect to ethical recruitment.

The John West Employee Code of Conduct refers explicitly to the CoC, and all employees are made aware of this both during induction and periodically throughout their employment when the handbook is updated. This document also explicitly states the policy and procedure applicable to Whistleblowing.



Both John West and Thai Union reserve the right to take legal action and report illegal activity to the relevant authorities and trade associations.

Training

To ensure a high level of understanding and awareness of the risks of modern slavery and human trafficking in our supply chains and our business, we provide mandatory on-line training to our employees on Modern Slavery awareness. The course has the following learning outcomes:

- To understand and work towards compliance with the Modern Slavery Act 2015
- Understand what slavery is and various forms that the modern slavery can take
- Learn what organisations and individuals can do to help get rid of slavery in the UK

Additionally, modern slavery awareness is covered in our induction process and all new starters complete the on-line training.

Recruitment

To remove the potential for modern slavery and human trafficking our recruitment practices ensure that all employees undertake pre-employment checks to confirm identity and right to work. Third party recruitment agencies working with John West can only be part of our preferred supplier list (PSL) if they sign and agree to our Recruitment Terms of Business which clearly state that all candidates put forward by them have proof of identity and a right to work in the UK. Our John West Equality, Diversity and Inclusion policy further reinforces the prohibition of discrimination in any aspect of employment.

Our effectiveness in combating slavery and human trafficking

A number of measures have been implemented to identify and record human rights abuse (including modern slavery and human trafficking) within our operations and supply chains. These measures comprise internal and external audits as well as provision of grievance channels.

1) Audits of Thai Unions own facilities

Thai Union factories and factories within the Thai Union and John West supply chain in Thailand are subject to internal audits as well as world recognised external verifications and audits by third-party certification bodies working to promote standard labour practices. These include the Ethical Trade Initiative (ETI) Base Code; Amorfi BSCI; SMETA; and Verite social capacity standards as well as a number of retailer specific programmes to audit and verify safe and legal labour conditions. In the last 12 months in the John West factory in Ghana social audits were held and no issues identified. In Portugal (Peniche) employees were trained on social matters and the Code of Conduct and completed a questionnaire to validate the results of the training; again, no issues were identified. In the Seychelles a SMETA audit was undertaken and some observations were made that are being addressed.



Supplier Approval Process and Supplier Audits

Thai Union also maintains rigorous procedures to screen and approve potential suppliers before we source from them. Compliance with the Thai Union Ethics and Labor Code of Conduct is required for all suppliers. New suppliers must acknowledge and accept the CoC and existing suppliers are required to review and sign the CoC. The Vessel Code of Conduct (VCoC) ([Thai Union VCoC](#)) applies specifically to the fishing vessels that Thai Union sources from (those that are the John West supply chain) and audits have been conducted since 2018 on tuna vessels around the world and Thailand vessels. For those suppliers that do not meet every clause in the Code, we ask that they work on a time-bound remedial plan to address the findings of the audit through the implementation of a 'Vessel Improvement Program' (VIP). Where any findings are found to be of a critical nature then business may be suspended immediately with a particular supplier.

2) John West Whistleblowing mechanism

In accordance with the Public Interest Disclosure Act 1998, the John West has instituted a system for reporting information which is reasonably believed to indicate a wrongdoing within the workplace. This process is documented in the John West Employee Handbook and is periodically shared with employees. No concerns about slavery and human trafficking within the John West supply chain have been reported through this channel during the previous twelve months.

Declaration

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending March 2019. It was approved by the board 9th September 2019

A handwritten signature in blue ink, appearing to read "Paul Reenan". The signature is fluid and cursive, with the first name "Paul" being more prominent than the last name "Reenan".

**PAUL REENAN,
REGIONAL PRESIDENT THAI UNION EUROPE, MD JOHN WEST FOOD LTD**

Date: 9th September 2019