



MODERN SLAVERY ACT STATEMENT

1st April 2023 – 31st March 2024 Financial Year



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1. Our Commitment

We have a responsibility as a business to respect human rights. We know that by protecting those in our supply chains, we also strengthen our business as a whole while building trust with our customers. Kingfisher Foods' mission is to provide high quality products that are responsibly and ethically sourced with best-in-class service.

Addressing modern slavery in a comprehensive and targeted way is a key element of how we fulfil our commitment to providing responsibly and ethically sourced products. Modern slavery is one of the most severe breaches of human rights; with food processing, agriculture, and fishing representing sectors which are most at risk. Nevertheless, identifying cases of modern slavery and forced labour within global food systems can be challenging. Kingfisher Foods works proactively to ensure engagement with its' modern slavery policies, within the context and belief that a widespread reduction in modern slavery can only be delivered through collaboration between businesses, governments, and civil society.



2. Our Organisation, Structure & Supply Chain

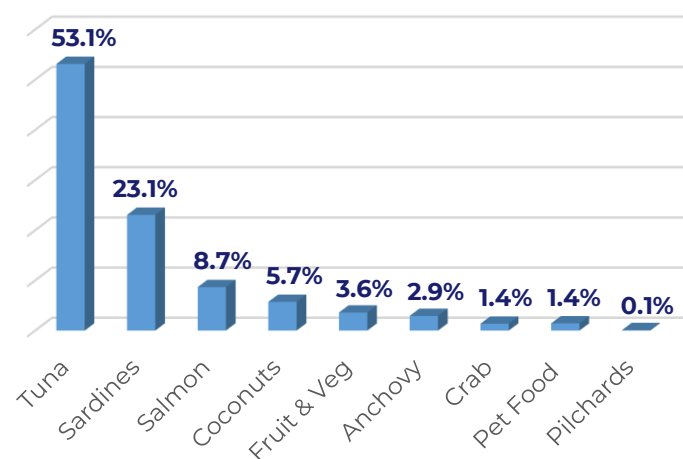


Figure 1: Volume of Cans

Kingfisher Foods is a leading UK-based value-added supplier of ambient foods, founded in 1979. The majority of our trade is in seafood; however, our product range includes fruit, vegetables, coconut products and pet food (Figure 1). Our products are sold under many customers' own labels and our own brand, Kingfisher.

Kingfisher Foods head office is located in Reigate, Surrey, where most of our employees are located. However, our technical team has offices in Liverpool, UK and Seattle, USA. We source internationally across a number of continents; including Asia, Africa, Europe, North America, and South America. Kingfisher Foods does not own or operate any processing facilities, nor does it own or operate any fishing vessels. Kingfisher Foods is passionate about taking a partnership approach with our suppliers; focusing on fostering long-term relationships, many of which span over 20 years.

2.1 Governance

Our modern slavery strategy is led by the Corporate Social Responsibility (CSR) Manager, working on a day-to-day basis with the CSR Executive. To strengthen Kingfisher Foods' commitment to combatting modern slavery, CSR is a standalone department, reporting to the Technical Director, with regular meetings with the Managing Director. This structure enables more efficient communication between the CSR Department, Technical Director, and Managing Director. This reflects Kingfisher Foods' high importance on CSR, with best ethical practice guiding all business decisions.

Governance and progress monitoring of our work on modern slavery and ethical trade is executed through monthly meetings between our Managing Director, Technical Director, and CSR Department. Our CSR team meets weekly to drive progress against our ethical trading and modern slavery targets.

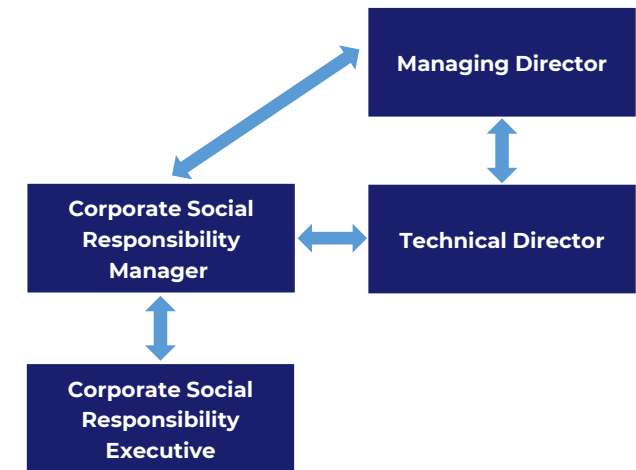


Figure 2: Organisational Structure of Decision-Making on Modern Slavery

2.2 Supply Chain Structure

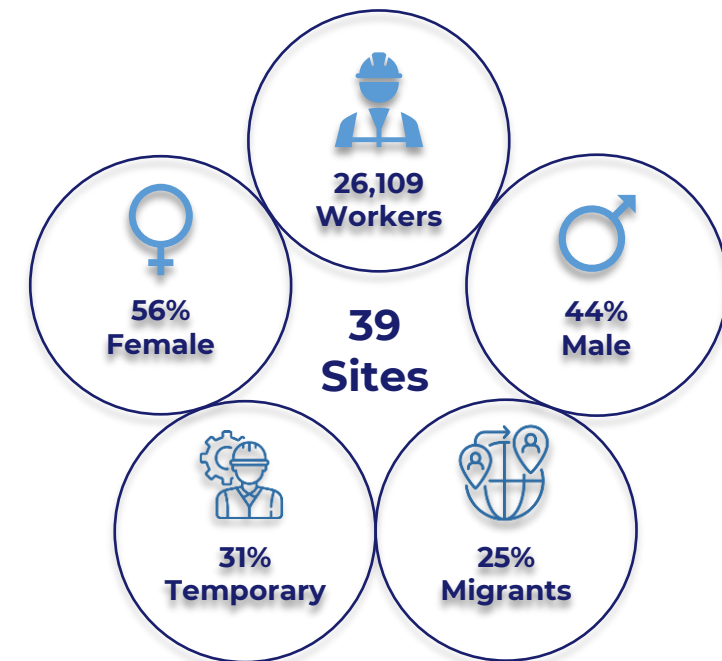
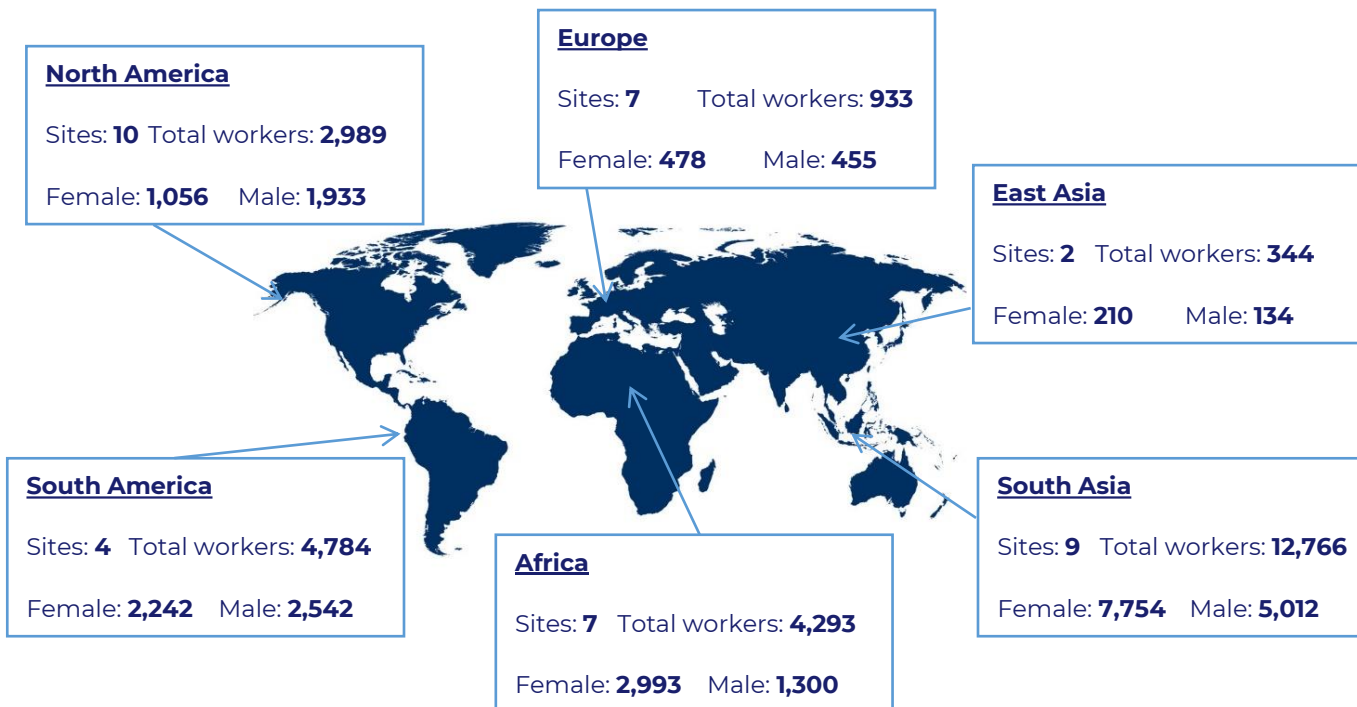


Figure 3: Breakdown of Supply Chain Workforce

3. Policies

Kingfisher Foods has a number of policies in place which work together to tackle the multi-faceted aspects of modern slavery and exploitation, whilst bettering health and safety standards and worker well-being. The applicable policies are clearly articulated to both suppliers and employees, and are signed upon commencement of trade.

Kingfisher Foods Ethical Trade Code of Conduct

Sets a baseline standard for suppliers to Kingfisher Foods to meet, covering the principles outlined in the Ethical Trading Initiative (ETI) Base Code.

In 2024, the code was updated to provide clear understanding of Kingfisher Foods requirements, and enables Kingfisher Foods to conduct CSR audits against the code.

Kingfisher Foods Ethical Trade Policy

Requires all suppliers, existing and prospective, to be a member of an approved ethical audit membership (Sedex or BSCI) or certification scheme (SA8000) and comply with the ETI Base Code.

Suppliers are additionally required to have an annual audit. These audits allow us to examine good labour practices amongst all suppliers throughout trade.

Fishing and Supply Vessel Code of Conduct

Requires suppliers to promote and maintain fundamental human rights and good working conditions across the fleets that they source from.

Tuna Sourcing Policy

Requires our tuna suppliers to increase transparency on the vessels that Kingfisher Foods source from. By maintaining an accurate vessel list at all times, we have established a traceable system that allows us to check working standards (specifically forced labour) on vessels annually.

The Tuna Sourcing Policy states that all vessels should work toward meeting the ILO C188 Work in Fishing Convention.

Supply Chain Equal Opportunity and Inclusion Policy

Clarifies and communicates our position on equal opportunity and inclusion within our supply chain.

Modern Slavery Whistleblowing Policy

To provide guidance and instruction to Kingfisher Foods employees on how to report and manage concerns regarding slavery in the workplace or supply chains should any arise.

Over the past year we have improved our ethical due diligence by ensuring our Modern Slavery policies outlined above are being adhered to within our supply chain. We have exhibited this through social audits and ethical visits, with all supplier sites having an active third-party ethical audit.

4. Risk Assessment, Prevention and Mitigation

Kingfisher Foods has a robust process in place to measure, monitor and prevent the risk of modern slavery within our supply chains, ensuring working conditions are continuously improving year on year. We have prioritised identifying and monitoring this risk, which has been made possible through our long standing and collaborative relationships with suppliers.

4.1 Assessing Risk

As laid out in our 2020/21 Modern Slavery Statement, we are committed to continually formalising our risk assessment process. Our approach to assessing risk within our complex supply network is driven through incorporating data sources at all levels of the supply chain.

The first step of our risk assessment is to identify suppliers' 'inherent risk'. We use Sedex's RADAR tool to provide an understanding of human rights risks at a country and sector level. This is combined with our own understanding of supplier-specific inherent risks, which comes through the enhanced Sedex 'Self-Assessment Questionnaire' (SAQ) and learning from our supply partners and their teams on the ground. Our assessment considers the additional risks associated with high-risk types of labour (seasonal, permanent, agency, migrant).

Once the inherent risk is identified, we evaluate how successfully suppliers manage these risks through third-party ethical audits, and site visits by Kingfisher Foods' CSR Department. In 2022/23, we achieved 100% coverage of our suppliers in third party ethical audits.

Additionally, by looking at the type of non-conformances that were raised by region more closely, we have been able to classify the most common risk areas that exist at supplier sites. These include; health and safety, working hours, and fair wages. By viewing these risks on a global scale (Table 1), we are able to prioritise specific labour rights risks accordingly in addition to supplier specific risks.

Table 1: Regional Non-Compliances Raised Within Audits 2023/24

Region	Total No. of Non-Compliances Raised in Audits 2023/24	Top 3 Non-Compliance Areas
East Asia	27	Health & Safety, Workers Protection, Management Systems
South Asia	16	Health & Safety, Working Hours, Management Systems
South America	5	Health & Safety, Management Systems, Workers Protection
North America	19	Health & Safety, Working Hours, Rest Days
Europe	10	Health & Safety, Discrimination, Management Systems
Africa	22	Health & Safety, Management Systems, Workers Protection

We also incorporate open-source data and supplier knowledge to assess risk further down our supply chain. As further due diligence, we worked directly with the Seafood Ethics Action Alliance (SEA Alliance) to develop a Human Rights Risk Assessment tool, which evaluates wild capture fisheries that are supplying to the UK on human rights risks using publicly available data to create a baseline assessment. Upon public release, we incorporated this tool into our risk assessment procedure to assess human rights risks in wild capture fisheries.

In 2023, we committed to mapping and risk assessing all farms in our agriculture supply chain, prioritising key supply chains. In 2023/24, we mapped and risk assessed all coconut milk and coconut oil farms. Our risk assessment is based upon location, management systems, length of the supply chain and known human rights risks.

We additionally committed to mapping the origin of packaging and ingredients for all products. By understanding the country of origin, we can identify country and industry specific risks, devising where due diligence is required. In 2023/24, we mapped the origin of all packaging components, identifying gaps in our current data collection. In 2024/25, we will review options for improving data collection, to be able to sufficiently risk assess our packaging and ingredients for all products.

In summary, our risk assessment process combines suppliers' inherent risks, performance, and fishery and farm specific risks to output an overall result, with the aim to risk assess the origin of packaging and ingredients. This will guide our decision-making and resource placement on ethical due diligence projects.

4.2 Managing and Mitigating Risk

Table 2: Kingfisher Foods Key Performance Indicators 2023/24

Financial Year	2020/21	2021/22	2022/23	2023/24
Total Supplier Sites	53	56	54	40
% of suppliers completed the updated SAQ	100%	100%	100%	100%
% of high/medium risk sites audited	89%	98%	100%	100%
% of sites with valid ethical audit	80%	98%	100%	100%
Number of Non-Compliances Raised	192	228	271	112
Number of Non-Compliances Closed	N/A	N/A	N/A	84

To monitor our first-tier suppliers, we require annual SMETA, BSCI or SA8000 third party audits to independently verify labour conditions at factory level. In 2021, we published our first set of ethical KPIs so that we could benchmark our progress year-on-year (Table 2). We aimed to increase third-party audit coverage and to reduce the number of non-compliances raised per audit by providing on-going supplier specific support. From 2023/24, we added an additional KPI for number of non-conformances closed, strengthening our commitment to continuous improvement, ensuring that any identified issues are promptly addressed and resolved, leading to safer and more ethical supply chains.

With the aim of building knowledge to strengthen supplier support, the CSR team completed the following training workshops during 2023/24:

Stronger Together

- ✓ *Tackling Modern Slavery in Businesses UK and ROI*
- ✓ *Effective Human Rights Due Diligence*

Responsible Recruitment Toolkit

- ✓ *Introduction to Responsible Recruitment*
- ✓ *Labour Supply Chain Due Diligence and Partnerships*
- ✓ *Eliminating Worker-Paid Recruitment Fees*

These learnings have enabled us to provide more refined and impactful guidance to remediate non-compliances and thus strengthen supplier support.

Through developing our risk assessment process, we have been able to better visualise and map risk as a whole across our supply chain. Since 2021/22, we have put our resources into expanding our ethical audit programme, so that our risk assessment process covers the entire supply chain, achieving 100% third-party ethical audit coverage in 2024.

4.3 External Engagement

In 2023/24, we continued our wider pre-competitive work, enabling us to increase leverage influence across our supply chains where a combined commercial force is most effective. The multi-stakeholder initiatives we engage in concentrate on two key areas: the provision on workers' rights and due diligence at sea. With in-person meetings becoming viable again, we were able to participate in more pre-competitive forums.

Table 3: External Partnerships

Member or Partner	Project or Initiative	Purpose
	Seafood Ethics Action Alliance (SEAA) Human Rights Due Diligence (HRDD) working group. Seafood Ethics Common Language Group (SECLG).	Both groups, run by Seafish, focus specifically on the provision of human rights at sea. We work collaboratively to a shared work plan to improve working conditions in the global fishing sector. We funded the development of a human rights risk assessment tool and worked towards its completion in the SEAA HRDD working group.
	Global Tuna Alliance (GTA) RFMO working group	The aim of the working group is to align international businesses advocacy ahead of Tuna RFMOs meetings. This includes requesting increased observer coverage, vessel monitoring systems, and public vessel databases.

5. Due Diligence Processes

In 2023/24 we continued to integrate knowledge of modern slavery within Kingfisher Foods, upholding the integration of ethical conditions within the contract approval process. Awareness of the risks of modern slavery within our supply chain continues to be sustained through: induction training covering internal approval processes and traceability at Kingfisher Foods, and the specific modern slavery training described below.

With site visits becoming viable in 2021/22, our CSR Manager performed an ethical due diligence visit to a high-risk tuna supplier. The visit verified compliance with both Kingfisher Foods Ethical Trading Policy and Fishing Vessel Social and Labour Policy and analysed the sites traceability systems from vessel to finished product, finding no issues. In 2022/23, our CSR Manager undertook Social Systems Auditor/Lead Auditor Training to strengthen supplier auditing capabilities. The CSR Department conducted an online audit of high-risk suppliers in 2022/23 to evaluate the effectiveness of Kingfisher Foods' monitoring systems and to ensure compliance to Kingfisher Foods and customer requirements. From this audit, we identified that the Kingfisher Foods Code of Conduct lacked specific clauses, meaning that measuring supplier compliance was difficult. In response, we redeveloped our Code of Conduct to include 45 clearly defined requirements. In 2023/24, we conducted a virtual pilot to assess effectiveness, finding that suppliers better understand the new requirements and making auditing more efficient and effective. In 2024/25, we aim to conduct an in-person audit of a high-risk supplier against the code.

Although the day-to-day management of ethical trade at Kingfisher Foods comes under the responsibility of the CSR department, we recognise the need for company-wide participation in preventing modern slavery within our supply chain.

Therefore, as part of our induction process, all staff are required to participate in our in-house CSR training which highlights potential labour rights issues within our supply chain and how their specific roles can impact working conditions at our supplier sites.

The CSR team also developed and deliver annual modern slavery-specific training to all Kingfisher Foods staff. This training covered a seafood-specific introduction to modern slavery, an explanation of how employee roles can impact working conditions at supplier sites and an understanding of how to spot the signs of modern slavery. In addition, the CSR team developed and distributed the '*Modern Slavery, Ethics and Sustainability Factsheets*' to all staff, and provided training on how to use them.



6. Effective Action to Address Modern Slavery

6.1 Progression of 2023/24 Targets

Over the next 12 months, we will build on the progress made so far in managing the risk of modern slavery in our supply chains. We have outlined below the specific steps taken during the past financial year:

Table 4: Progression of 2023/24 Targets

Target	Definition	Status	Comments
Strengthening Supplier Support	We will continue to develop our 'New Supplier Pack' to further enhance supplier experience and understanding of conducting ethical audits.	Complete	Kingfisher Foods 'New Supplier Pack' includes all Kingfisher Foods and relevant customer policies, ethical audit guidance, SMETA and BSCI resources, and guidance for the Sedex SAQ.
	To encourage our suppliers to engage with resources such as the Responsible Recruitment Toolkit (RRT).	Complete	Kingfisher Foods partnered with the RRT to provide best practice guidance to Thai suppliers. We facilitated the translation of the RRT 'Labour Supply Chain Due Diligence Checklist' into Thai, to enable the removal of recruitment fees in a Thai tuna processor. In 2023/24, Kingfisher Foods eliminated recruitment fees from our supply chain.
Enhancing Internal Awareness	We plan to review our internal modern slavery training, particularly in the context of the newly published 2023 <i>Global Slavery Index</i> .	Complete	Kingfisher Foods Modern Slavery training was updated with latest information and delivered to all staff. This training occurs annually.
	We plan to provide internal training on our <i>Whistleblowing Policy</i> , to ensure staff are aware of how they can safely raise concerns about modern slavery.	Complete	Training for the <i>Modern Slavery Whistleblowing Policy</i> was delivered within our annual Modern Slavery training.
	We plan to update our CSR induction training, particularly in the context of the newly published 2023 <i>Global Slavery Index</i> and <i>Whistleblowing Policy</i> .	Complete	Kingfisher Foods CSR induction was updated to include relevant Modern Slavery training, and delivered to all new staff as part of our onboarding procedure.

Table 4: Progression of 2023/24 Targets (Continued)

Target	Definition	Status	Comments
Strengthening Supplier Support	We will continue to develop our 'New Supplier Pack' to further enhance supplier experience and understanding of conducting ethical audits.	Complete	Kingfisher Foods 'New Supplier Pack' includes all Kingfisher Foods and relevant customer policies, ethical audit guidance, SMETA and BSCI resources, and guidance for the Sedex SAQ.
	To encourage our suppliers to engage with resources such as the Responsible Recruitment Toolkit (RRT).	Complete	Kingfisher Foods partnered with the RRT to provide best practice guidance to Thai suppliers. We facilitated the translation of the RRT 'Labour Supply Chain Due Diligence Checklist' into Thai, to enable the removal of recruitment fees in a Thai tuna processor. In 2023/24, Kingfisher Foods eliminated recruitment fees from our supply chain.
Enhancing Internal Awareness	We plan to review our internal modern slavery training, particularly in the context of the newly published 2023 <i>Global Slavery Index</i> .	Complete	Kingfisher Foods Modern Slavery training was updated with latest information and delivered to all staff. This training occurs annually.
	We plan to provide internal training on our <i>Whistleblowing Policy</i> , to ensure staff are aware of how they can safely raise concerns about modern slavery.	Complete	Training for the <i>Modern Slavery Whistleblowing Policy</i> was delivered within our annual Modern Slavery training.

6.2 Targets for 2024/25

Over the next 12 months we will continue to strengthen our approach to managing the risk of modern slavery within our business and supply chain and ensure our strategy is responsive to changing risks. Our targets for 2024/25 are detailed below (Table 5):

Table 5: Targets for 2024/25

Strengthening Supplier Support

Develop a CSR Compliance Procedure, aiming to share Kingfisher Foods and customer policies in a clear and efficient manner. This will ensure that suppliers can have a better understanding of requirements.

Add a requirement to the Kingfisher Foods Ethical Trade Code of Conduct, prohibiting Recruitment Fees in Kingfisher Foods' supply chains.

Enhancing Internal Awareness

On an annual basis, update and deliver the internal Modern Slavery training, enabling all employees to understand Modern Slavery, spot the signs and know how to report concerns.

Improving Risk Mapping

In 2023/24, we aimed to map the origin of all packaging components. We record this data in Product Master Specifications, but identified inconsistencies in the level of information provided by suppliers. In 2024/25, we will update the Kingfisher Foods Product Master Specification to standardise the level of data provided by suppliers. We will also include additional questions to better support our risk assessment. We will begin using the updated Master Specification for products in 2025, to begin the risk assessment in 2026.

To continue mapping and risk assessing all farms, we will map and risk assess all Chinese farms in 2024/25.

Increasing Due Diligence

Develop a Purchasing Policy to outline the requirements for our procurement team to ensure that the sourcing of products is made from suppliers who have been internally approved across a number of areas, including an assessment of their ethical trade credentials and level of transparency.

Partner with ES3G to receive direct worker feedback from a high-risk supplier.

Using the updated Ethical Trade Code of Conduct, we aim to conduct an in-person audit of a high risk supplier.

Using the SEA Alliance Human Rights Risk Assessment tool, we have identified high-risk source fisheries. In 2024, we aim to have vessels audited in a key high-risk supply chain.

As outlined above, Kingfisher Foods is diligently engaged with eradicating the risk of modern slavery from our supply chains. However, we recognise that ethical issues are not static, requiring us to continuously improve our efforts.

Contact Information

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At Kingfisher Foods, we recognise our responsibility to source products with respect for the environment and people, and we take pride in our proactive approach. Responsible sourcing is an ongoing process, not an end point; thus, we welcome the opportunity to report yearly on our progress in accordance with Section 54(1) of the Modern Slavery Act 2015. This statement containing our commitments and future targets towards strengthening our response to tackling modern slavery is endorsed by our Managing Director and approved by our Board of Directors.

Signed:



John Sexton

Managing Director

September 2024