



# MODERN SLAVERY STATEMENT

## Policy Statement

J Marr (Seafoods) Ltd Group is committed to driving out acts of modern slavery within its business and that from within its supply chains, including suppliers, contractors, sub-contractors, and partners.

The Company acknowledges their responsibilities in respect to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods / services to the organisation, as well as the main supply chain for J Marr (Seafoods) Ltd.

As part of the company's due diligence processes into modern slavery the supplier approval process incorporates a review of the controls undertaken by the suppliers of goods / services.

Traded goods from sources from outside the UK and EU are potentially more at risk from modern slavery including human trafficking issues. The level of management control required for these sources will be continually monitored.

The company will not support or deal with any business knowingly involved in modern slavery.

## Responsibilities for the Policy

The Managing Director, senior management and all managerial staff shall take responsibility for understanding, complying with and implementing this policy, its commitments and shall provide adequate resources (including information, instruction, monitoring and reporting of issues etc) and investment to ensure that modern slavery is not taking place within the organisation and within its supply chain.

## Organisational structure

Founded in 1986, Andrew Marr International Ltd has its head office based in Hessle, East Yorkshire.

It's main subsidiary, businesses are J Marr (Seafoods) Ltd, J Marr (commodities) Ltd, J Marr (Seafoods) Europe SL, J Marr (Dry Foods) Ltd, J Marr (Shanghai) Trading Co Ltd.

The following companies are subsidiaries of Andrew Marr International Ltd and form part of the overall group of companies: AJK Ltd – Cold Stores, operating and rental of cold storage, P&J Johnstone Ltd – Fish catching, fishing vessel management and fish selling in the North East of Scotland, Fastnet Fish Ltd – Sourcing of frozen seafoods for the processing, wholesale catering

and retail sectors and Marrfish Ltd – processor and supplier of fresh fish and seafood.

## **Seafood Supply Chain**

Our business makes purchases of various marine capture and aquaculture raised species from the following countries:

The European Union, China, Vietnam, Korea, Russia, Chile, Peru, Ecuador, Mexico, Taiwan, Turkey, Uruguay, Argentina, Brazil, USA, Australia, New Zealand, Mauritania, Morocco, Norway, Ireland, Faroe Islands, Senegal, Namibia, South Africa, Oman, Japan, Scotland, India and any other area that the company or any Group company sourced product from or had dealings with.

Purchases may be made directly from fishing vessel operations, their selling agents or land-based processors and farms. Part of the J Marr Ethos is to develop long-term relationships with suppliers, and we make regular visits to key suppliers, whether this is to oversee loading operations or visits to continue the development of working relationships.

## **Risk Assessment**

Within the global seafood industry, both the catching and processing sectors in some regions are known to have instances of human rights issues. As an example, migrant workers being deceived into enduring prolonged non voluntary periods of work on fishing vessels without payment or benefits and subjected to threats and physical abuse. We are also aware, through media articles and NGO reports, of human rights abuse, both onboard fishing vessels and within the land-based farming and processing sector.

Due to the complexity of the seafood supply chains within our businesses, there can often be many tiers involved from wild caught marine fisheries and land-based aquaculture. Our supply chains may stretch through several countries from point of capture through catchers, farmers, auctions, processing, importers, agents and brokers. This complexity makes the mapping of seafood supply chains difficult.

We recognise that our supply chains could potentially have a higher risk than normal compared to those of a relative simpler nature. Therefore, we have introduced a supplier approval procedure which includes the Supplier Ethical Questionnaire and the Supplier Modern Slavery Commitment.

We expect our suppliers to comply with our ethical standards, going forward as part of our onboarding process for new suppliers, we will formally request each supplier confirms they meet with modern slavery considerations within their own business. Further to this that they commit to taking reasonable steps to ensure that there will be no instances of modern slavery in any part of their business or supply chain going forward.

Risk is assessed by supplier, country of origin and the mitigations and considerations that are in place to ensure that illegal labour and human trafficking risks are assessed.

## **Our Policies**

We are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business.

As an equal opportunities' employer, we're also committed to creating and ensuring a non-discriminatory and respectful working environment for our people. Our Equality, Diversity and Inclusion Policy commits to:

- create a working environment that promotes dignity and respect for every employee.
- not tolerate any form of intimidation, bullying or harassment, and to discipline those that breach this policy.

Our recruitment and people management processes are designed to ensure that all prospective employees are legally entitled to work in the Country they are employed in. Further to this all employees and sub-contractors are paid directly into their own bank accounts.

Our Modern Slavery Policy maps out our business and individual responsibilities in the prevention, detection and reporting of modern slavery, to ensure that it is not taking place within the organisation and within its supply chain. This includes guidance on how to raise a concern if it is believed or suspected that a breach of the Modern Slavery Policy has occurred or may occur in the future.

The group has a Whistleblowing Policy which encourages employees to report any concerns in the supply chains. This includes any circumstances which may give rise to an enhanced risk of modern slavery. Any issue raised related to modern slavery will be taken seriously and thoroughly investigated.

We have added a reference of our standards on all purchasing orders and supplier contracts. As such, all suppliers will be expected to fully reject the use of forced, bonded or trafficked labour. This statement reflects our commitment to acting ethically in all our supplier relationships and to ensuring no modern slavery in our supply chains.

### **Breach of policy**

Employees who breach this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

### **Policy review**

A copy of this policy will be accessible to all employees electronically and can be obtained from the Company's Intranet.

This policy statement will be reviewed annually and published.

## **Commitments**

We are a company that expects everyone working with us or on our behalf to support and uphold the allowing measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chain;
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us, with us or on our behalf.
- Employees must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this policy;
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain;
- If we find that other individuals or organisations working with us or on our behalf have breached this policy, we will ensure that we take appropriate action.
- Ensuring that employees involved in buying or procurement and the recruitment and deployment of other employees receive training on modern slavery and ethical employment practices.

We will continue to develop our systems and tools to analyse further our supply chains to combat the risks associated with the purchasing and distribution of frozen proteins, meat and poultry products and Dry Food products and will take action where necessary. This includes, but is not limited to:

Business Relationship Checks: We will continue to develop our supplier checks and supply chain monitoring and will work with our suppliers to further our understanding in order to further our assessment of the risks.

## **Action**

Any reports or suspicions of modern slavery including human trafficking, or breaches of our policies that come to our attention will be assessed on a case-by-case basis. All concerns will be investigated promptly and thoroughly.

If concerns or allegations are substantiated, appropriate remedial action will be taken. Where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.

If a supplier's efforts to address these issues are deemed unsatisfactory, J Marr may temporarily suspend business with them, subject to contractual and legal rights. Should the supplier fail to demonstrate sustained compliance, we may terminate the business relationship.

There have been no reported incidents of modern slavery within our supply chain during the 2024–2025 period to date.

## **Training**

The group is committed to enhancing its training relating to our Modern Slavery Policy. As such, training dealing specifically with the need for suppliers to understand and comply with our policy on the issue of modern slavery will be further developed, with new mandatory training being implemented.

Signed for and on behalf of

J Marr (Seafoods) Ltd

Michael I A Moore

Managing Director

Date: