



J MARR (SEAFOODS) LTD, J MARR (COMMODITIES) LTD, J MARR (SHANGHAI) TRADING CO LTD
J MARR (SEAFOODS) EUROPE, SL, J MARR (DRY FOODS) LTD

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY STATEMENT

Policy Statement

J Marr (Seafoods) Ltd Group is committed to driving out acts of modern slavery and human trafficking 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 and human trafficking 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 /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 or human trafficking.

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 and human trafficking 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 – Sourcing and trading fish globally, J Marr (commodities) Ltd – Sourcing and trading meat globally, J Marr (Seafoods) Europe SL, J Marr (Dry Foods) Ltd, J Marr (Shanghai) Trading Co Ltd.

As part of the Andrew Marr International Group, the following subsidiary companies we also have are 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, Guinea Bissau, Gambia, 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 Human Trafficking and an Anti-Slavery Commitment.

We expect our suppliers to comply with our ethical standards, as part of our supplier approval process, we will formally request each supplier respond to confirm they meet with anti-slavery and human trafficking considerations within their own business. Further to this that they carry out due diligence procedures with respect to slavery and human trafficking in the selection of their own suppliers.

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 or human trafficking 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 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.

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 slavery or human trafficking. Any issue raised related to anti-slavery will be taken seriously and thoroughly investigated.

Over the next year we will be adding 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 or human trafficking exists 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 following measures to safeguard against modern slavery and human trafficking:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chain;
- The prevention, detection and reporting of modern slavery and human trafficking 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 and human trafficking 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.

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 annual training being implemented.

Signed for and on behalf of
J Marr (Seafoods) Ltd



Michael I A Moore
Managing Director

Date: 13/08/2024