

Clearwater Fine Foods (Europe) Limited
2019 Anti-Slavery and Human Trafficking Statement

Company Overview

Clearwater Fine Foods (Europe) Ltd. (“Clearwater”), a United Kingdom-based, wholly owned subsidiary of Clearwater Seafoods Incorporated, is engaged in the business of, and the ownership, operation and lease of assets and property in connection with, the distribution and marketing of seafood.

Supply Chain

Clearwater has a zero-tolerance approach to slavery and human trafficking within the organization and its supply chains and is committed to conducting business ethically to ensure that the risk of slavery and human trafficking taking place within the business or its’ supply chains is mitigated. Clearwater expects its suppliers to meet these same standards. This is achieved through direct engagement with suppliers and procurement partners and educating our workforce on the risk of modern slavery.

Our Policies and Principles

Clearwater has in place a number of policies which address issues relevant to slavery and human trafficking, including:

- The Code of Business Conduct, including Anti-Bribery and Corruption Policy;
- An Enterprise Risk Management Committee that utilizes a risk assessment framework to identify areas of potential risk in the business, including slavery or human trafficking with its supply chain;
- Employment practices and procedures which ensure fair recruitment and treatment of employees, including ensuring that employees take up employment of their own accord and are able to terminate their employment of their own free will;
- An Audit Committee with oversight of whistleblowing complaints which enables employees to report in confidence any concerns of malpractice or other unethical behaviour, which includes any concerns related to slavery and human trafficking issues;
- Written contracts with suppliers and vendors where appropriate.

Due Diligence Processes

The following action steps have been undertaken with the aim of ensuring that the risk of slavery and human trafficking taking place in any part of our business or our supply chains is mitigated:

- In an effort to continually raise awareness, our Code of Conduct is reviewed regularly and required to be signed by all employees annually. This was completed in 2019 in accordance with our corporate practice.
- Standard terms and conditions of employment were reviewed in 2019, ensuring that the relationship between employees and the business continues to remain fair and equitable;
- Mandatory online training on the Business Code of Conduct, and online classroom-based compliance, ethics and human rights training and continuous awareness initiatives to all employees;
- Many of our supply chain partners have standard tender documentation, ensuring that prospective partners confirm that they comply with the Modern Slavery Act;

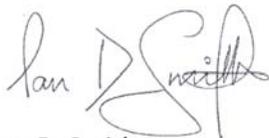
- Steps are taken to strengthen supply chain auditing and verification and investigate any and all reports of unethical labour practices and adopt remedial actions, wherever they exist in the supply chain.
- To ensure legal compliance, conducted reviews and third-party audits of selected operations,
- Continue to work to develop personal relationships in order to better understand our commercial partners and foster long-term relationships to ensure that strategic partners share our business values; and
- In 2019 Clearwater partnered with International Organization for Women in the Seafood Industry (WSI) to further the organizations' goals of a seafood sector free from gender inequality, sexism, discrimination, slavery, and human trafficking. In addition to becoming a member in 2019, Clearwater has representation on the WSI Board of Directors.

Our Continuing Commitment

Taken together, this integrated approach will enable Clearwater to better understand its commercial partners, foster long-term relationships with suppliers, and manage the risks associated with unethical labour practices. Clearwater will continue to take these and other steps during the current financial year, with the aim of ensuring that slavery and human trafficking do not occur in any part of our business or our supply chains.

Board Approval

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Clearwater's slavery and human trafficking statement for the financial year ended 31 December 2019. Due to the global COVID-19 pandemic, and the deadline extension provided, it was approved by the Board of Directors on December 21, 2020.



Ian D. Smith
Chief Executive Officer



Colin MacDonald
Chairman of the Board