

**Clearwater Fine Foods (Europe) Limited**  
**2021 Anti-Slavery and Human Trafficking Statement**

**Company Overview**

Clearwater Fine Foods (Europe) Limited, a United Kingdom-based, wholly owned subsidiary of Clearwater Seafoods Holdings Incorporated (collectively referred to as “the Company”), 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**

The Company 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. The Company 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.

**A Responsible Employer**

To ensure that we recruit and treat employees fairly, eliminating modern slavery at all costs, our human resources (HR) policies set out our procedures on how we:

- Recruit and select employees in a fair, lawful and professional manner, both for internal and external candidates.
- Treat all employees fairly during their employment and, if there is an occasion when an employee does not feel that they have been treated fairly, there are procedures in place to raise a grievance or involve a local trade union, where they exist, or where this is a legal requirement to do so.
- Manage the exit of an employee from the business in a fair and consistent manner and conduct exit interviews where appropriate.
- Provide fair working conditions for all our employees including terms and conditions of employment, remuneration, working hours, health and safety, resting time, holiday entitlements, and benefits. These are applied according to territory-specific statutory requirements. Our employees’ pay will not be lower than that required by law or, in the absence of a law, the level paid generally within that industry. Furthermore, the Company undertakes regular pay benchmarking to ensure fair working conditions and compensation exceed requirements wherever possible.

**Our Policies and Principles**

The Company is dedicated to maintaining a fair and ethical workplace for our all our staff and has established a range of policies and measures 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 within its supply chain.

- The Ethics Hotline allows employees to confidentially raise any concerns regarding unethical business practices or illegal activity, or any other unethical behaviour, which may include any concerns related to slavery and human trafficking issues.
- Written contracts with suppliers and vendors where appropriate.
- A corporate social responsibility strategy which reinforces our commitment to combating modern slavery.

### **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:

- During 2021 we have refreshed our Code of Conduct. The Code of Conduct describes what we must do and how we must behave to ensure we have the trust of all our stakeholders. It details how we will create better outcomes in the right way in line with our purposes and values. All employees are required to sign our Code of Conduct annually.
- Standard terms and conditions of employment were reviewed in 2021, 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.

### **Our Continuing Commitment**

In 2021, the Company participated in the development of an independent third-party ethical labour standard specifically designed for the wild fishing sector. The FISH Standard (<https://fishstandard.com/>) was developed to assure seafood buyers that the fish they are buying and selling is harvested by crews that are:

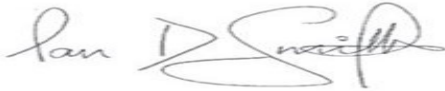
1. Recruited and hired ethically
2. Treated with respect on the vessel
3. Paid properly
4. Have processes to address grievances

Taken together, this integrated approach will enable the Company to better understand its commercial partners, foster long-term relationships with suppliers, and manage the risks associated with unethical labour practices. The Company 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.

To further increase awareness regarding the potential risks of modern slavery, as well as the possible indicators, the Company publishes a copy of this statement on the Company website.

**Board Approval**

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Company's slavery and human trafficking statement for the financial year ended **December 31, 2021**. This statement has been approved by the undersigned representatives effective **June 30, 2022**.



Ian Smith  
Chief Executive Office



George Paleologou  
Director



Chief Terry Paul  
Director