

Clearwater Fine Foods (Europe) Limited
2020 Anti-Slavery and Human Trafficking Statement

Company Overview

Clearwater Fine Foods (Europe) Ltd., a United Kingdom-based, wholly owned subsidiary of Clearwater Seafoods Incorporated (collectively referred to as “Clearwater”), 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.

Clearwater – 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.
- 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.

Our Policies and Principles for All Employees

We are dedicated to maintaining a fair and ethical workplace for all our staff. Clearwater has in place several 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 within its supply chain.
- The corporate Ethics Program provides a mechanism for employees to confidentially raise any concerns, up to an including illegal activity. Employees are made aware of the Ethics Hotline, and all complains received are reviewed by the Board of Directors. The policy includes appropriate guidance 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:

- During 2020 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 2020, 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

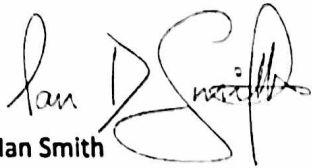
Our Continuing Commitment

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.

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 2020. It was approved by the following representatives of the Company on June 30, 2021.



Ian Smith
Chief Executive Officer



George Paleologou
Director



Chief Terry Paul
Director