

## **The Big Prawn Company Limited – Modern Slavery Act Statement 2019**

This statement has been produced in accordance with the Modern Slavery Act 2015. It sets out the steps taken by the company for the financial year ending 31<sup>st</sup> May 2019, demonstrating its commitment to understand modern slavery risks and to ensure that there are no modern slavery and human trafficking within the business and supply chains.

### **Introduction**

The business, which was established in 1995, processes seafood to produce its own label and branded products to retail customers from a factory in Melton Constable, North Norfolk. The company employs around 100 permanent employees which are supplemented by seasonal agency workers. The Company has a zero-tolerance approach to modern slavery and is committed to acting ethically and with integrity and transparency in all of its business dealings and relationships by implementing and enforcing effective policies, systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within either its own business or in any of its supply chains.

### **Within our business**

The company has robust processes for the recruitment of employees and Managers within the business including Human Resources. Key Managers have attended Strong Together training in awareness of the signs of modern slavery and hidden labour exploitation and this training is reviewed annually, as part of its due diligence, to ensure the business' knowledge is current in understanding modern slavery risks. The Company will only use reputable employment agencies for the supply of temporary labour and performs audits to ensure that they hold and maintain GLAA licensing and are ALP registered. We work closely together with our employment agencies to ensure their processes are robust in the recruitment of agency workers. Materials from Stronger together have been incorporated into the employee and agency worker induction material, and posters are displayed on site informing employees where help may be obtained if required. As a SEDEX (Supplier Ethical Data Exchange) AB Member, the company takes part in regular SMETA (SEDEX Member Ethical Trade Audit) Audits. These audits are based on the ETI Base code, which is founded upon the standards of the International Labour Organisation;

- Employment is freely chosen
- Freedom of association
- Working conditions are safe and hygienic
- Child labour shall not be used
- The National Living wage is paid
- Working hours are not excessive
- No discrimination is practiced

- Regular employment is provided
- No harsh or inhumane treatment is allowed.

These standards are supported by the following internal policies: Anti-Slavery and Human Trafficking, Ethical Trading, Human Rights, Prevention of Bullying and Harassment, Recruitment, Young Persons and Health & Safety.

### Within our Supply Chain

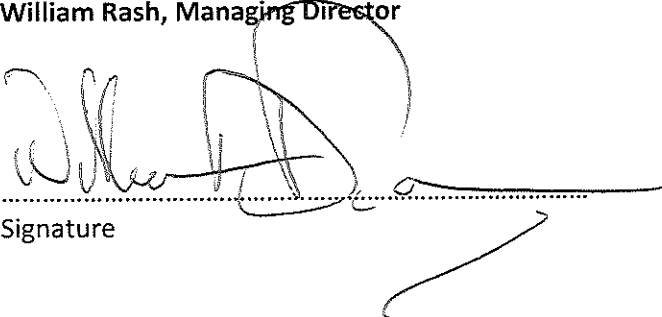
The company's sources its raw materials from a global supply chain including Europe, North and South America, Madagascar, and Southeast Asia. The company follows robust policies and procedures in its sourcing and takes all reasonable steps to ensure compliance within its overseas supply chain. This will include routine visits, auditing and monitoring compliance against the ETI base code, by requiring suppliers to be registered SEDEX members and to undertake SMETA ethical audits as defined by the company's risk assessment.

### Review

The company understand that preventing modern slavery is an ongoing process and it will continue to build capability by actively improving both our internal processes and by working with our suppliers to continually reduce risks. The Modern Slavery Act statement will be reviewed annually, and in line with legal requirements.

This statement was approved by the Board of Directors of The Big Prawn Company Ltd.

**William Rash, Managing Director**

  
Signature

3/1/20  
Date

