



Lunar Freezing & Cold Storage Company Limited Lunar Fishing Company Limited

Modern Slavery Statement

This statement has been published in accordance with Section 54, Part 6 of the Modern Slavery Act 2015. It sets out the steps taken by Lunar Freezing & Cold Storage Company Limited and Lunar Fishing Company Limited to prevent modern slavery and human trafficking in our own operation and supply chain. This statement refers to the financial year ending 31 December 2020

Introduction

We are committed to high standards of professionalism, integrity, and ethics in conducting our business. We do not tolerate any form of slavery, servitude, forced or compulsory labour or human trafficking in any part of our business or our supply chains. We are taking steps to ensure that our supply chains are free from slavery and human trafficking.

Structure and Supply Chains

The family's fishing traditions go back many generations, but the Lunar Fishing company started with the purchase of the Admiralty steel drifter "Lunar Bow" in 1945. The company was named after her and has always had a vessel of that name in its fleet to this current day.

Based in the fishing ports of Peterhead, Fraserburgh and Aberdeen, the Company is in a commanding position to supply herring, mackerel, blue whiting and whitefish products from catching to final delivery worldwide.

Lunar Fishing operates five fishing vessels, two Pelagic Trawlers, Lunar Bow and Pathway, two Whitefish Trawlers, Harvester and Ocean Harvest, one Whitefish Seiner, Tranquility. Fish landed to the Lunar facilities are kept at premium quality by modern and efficient chilling equipment on-board.

The Company owns a fleet of articulated units, refrigerated trailers and tankers capable of supplying temperature-controlled products from fishing vessels to processing factories. Onward despatch is available from cold store to customers in the UK and Europe.

As one of Scotland's few remaining independent, family-owned traditional primary processors and traditional smokehouses we are driven by a dedicated team of craftsmen with youth and passion, alongside talent and experience. Our manufacturing sites in Peterhead and Aberdeen supplying whole fish, machine cut and hand cut fish to our customers.

Relevant Policies

We recognise and accept our responsibility for preventing modern slavery within our own operation and our supply chain and that human rights of people engaged with producing food products supplied to our customers are adhered to.

We operate a number of policies and procedures to support commitment:

- Modern Slavery Policy
- Corporate Social Responsibility Policy
- Ethical Trading Policy and Ethical Trading Initiative Base Code
- Whistleblowing
- Anti-Bribery
- Grievance procedure

All those are reviewed regularly and set out the standards that we expect to be in place throughout our supply chain as well as in our own operations. We seek to develop long term relationships with our suppliers who share the same ethical standards.

Workers engaged within our own operation have been receiving relevant training about above policies.

Risk Assessment and Due Diligence Process

As a core element of due diligence process, we have mapped and reviewed our stakeholders and tier one of supply chain. We understand that due to complexity of our supply chain more in depth mapping will be required for some suppliers to better understand risk of modern slavery within our supply chain and this will be reviewed in 2021.

We have issued the Ethical Questionnaire to our tier one suppliers and contractors. We are collecting, monitoring and analysing data regarding suppliers which helps us to measure risk of modern slavery within their business. Where applicable, we obtain modern slavery statements from suppliers and any other relevant policies and procedures they have in place in relation to human rights and tackling modern slavery. Commitment to adhering Lunar Modern Slavery Policy and Ethical Trading Policy forms part of supplier approval agreement process.

We are committed to responsible sourcing and to the Responsible Fishing Scheme (RFS). The Responsible Fishing Scheme (RFS) is a third-party certification scheme developed by industry to recognise vessels with high standards of crew welfare and responsible catching practices it covers internationally recognised universal standards, including the United Nations Universal Declaration of Human Rights and its Protocols.

Lunar was engaged with a review of The Responsible Fishing Vessel Standard (RFVS) which is a voluntary, vessel-based program certifying focus on crew welfare and underpinned by two core principles: Vessel Management and Safety Systems, and Crew Rights, Safety and Wellbeing. The RFVS is an assurance tool to help fishing vessel owners and operators showcase industry-agreed best practice through independent, third-party auditing.

The Company is B member of the Supplier Ethical Data Exchange (Sedex) which is the largest collaborative platform for sharing responsible sourcing data on supply chain and help us to conduct an effective risk assessment as it gives us insight to our supplier's self-assessment details. In 2021 selected company sites will be subject to Sedex Members Ethical Audits which helps us to improve on ethical standards within our own operations.

Due to the nature of business (unskilled jobs, migrant workers, seasonal work) we have identified that main risk within our own operations relates to Lunar using labour providers. We ensure that all labour providers used are GLAA certified and work closely with The Association of Labour Providers. We have well-established relationship with all labour providers and their compliance with employment law, ETI Base Code are measured by annual labour provider's ethical audit. Confidential workers interviews form an integral part of the audit.

We acknowledge that the COVID-19 pandemic has brought challenges that may increase the risk of modern slavery in supply chain. During pandemic we have developed Covid-19 Emergency Response Plan which outlines steps taken to protect workforce, support our suppliers and to ensure business continuity during pandemic.

In response to pandemic in 2020 we have conducted additional checks to ensure workers' rights are protected during pandemic and they feel safe at work (staff survey and feedback interviews, an additional labour provider audits). Communication played an important part in our pandemic response. Any new guidance regarding Covid-19 has been issued to direct and indirect workers (for example entitlement to Statutory Sick Pay from day one) to ensure awareness about rights and offer support if needed. We also work closely with employee representatives on this matter.

We have participated on a number of webinars to help us with pandemic response. We are following responsible recruitment practical guide during and coming out of Covid-19 published by Stronger Together and work closely on this with our labour providers.

Training for staff

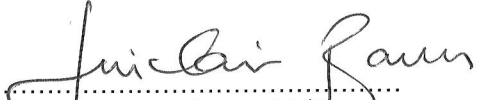
Due to post Brexit immigration law changes, there is no legal immigration route for low skilled workers which may lead to an increased risk of forced labour, debt bondage and modern slavery.

We offer support to migrants' workers with securing their post Brexit immigration status (applications to the EU Settlement Scheme). We continue to ensure that all workers engaged in our business have the correct documentation in place.

We have developed a training which covers issues related to modern slavery and includes a Stronger Together video about signs of modern slavery, reminder of Company grievance and whistleblowing procedures and Ethical Trading Initiative Base Code. Leaflets will be handed out to attendees at the end of the training with details about reporting modern slavery, company whistleblowing line number, main contact details and reminder of the Ethical Trading Initiative Base Code.

Training will be delivered in a language that staff can understand. Stronger Together posters and leaflets in a language understood by workers are displayed at notice boards.

We work closely with our customers and the new workers survey programme will be implemented by end of this year to measure workers satisfaction. Any feedback from workers surveys will be analysed and steps taken to improve where applicable.


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Sinclair Banks, General Manager

24TH MARCH 2021
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Date

