



## **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 2022

#### **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 throughout our supply chains. We are focused on the protection of fundamental human rights of workers engaged in our own operation and supply chains.

#### **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 1950. 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 and one Whitefish Seiner, Tranquillity. 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 supply whole fish, machine cut, and hand cut fish to our customers.

#### **Policies and Procedures**

The company recognises and accepts its responsibility for preventing modern slavery within its own operation and supply chain and that human rights of people engaged with producing food products supplied to our customers are protected.

In 2022 we have reviewed and improved our policies and procedures:

- Modern Slavery Policy
- Corporate Social Responsibility Policy
- Ethical Trading Policy based on the Ethical Trading Initiative Base Code
- Whistleblowing Procedure
- Anti-Bribery
- Grievance procedure

Supplier commitment to following Lunar standards outlined in the Ethical Trade and Modern Slavery Policy forms an integral part of Supplier Approval Agreement. Any new supplier is asked to sign this agreement and it is renewed every 3 years.

## **Risk Assessment and Due Diligence Process**

In 2022 we have reviewed The Human Rights Risk Assessment (HRRA)

### **Own operation**

HRRA identified that some groups of workers are on higher risk to be subject to human rights abuses (especially forced labour risk) and the following valuable groups were identified: migrant workers and migrant workers on agency contract.

The country, sectoral risk assessment and a risk connected with using labour providers was taken into account when the severity and likelihood for the HRRA was calculated.

Taking all the above into account the following areas were identified as a high risk in our own operation:

- Forced labour/withholding workers identification.
- Labour practices (extensive working hours, wages, statutory payments, maternity protection, right to work)
- Discrimination/Bullying and harassment

To reduce risk level to medium/low we have taken the following steps:

- We ensure that all labour providers used are GLAA certified.
- We have a well-established relationship with all labour providers.
- All labour providers are members of the Association of Labour Providers.
- Labour providers compliance with current employment legislations and the Ethical Trading Initiative Base Code are measured by annual labour provider's ethical audits.
- On site rights to work check carried out to ensure workers documents are not withheld.
- Regular site visits, support and guidance from Group HR Advisor and Group Health and Safety Advisor.
- Worker's representation established at production sites and meets regularly.
- Suggestion box implemented.
- ETI Base Code communicated to workers, materials from Stronger Together website displayed around site.
- Confidential workers survey carried out.
- Production sites are subject to the SMETA audits.
- Lunar Fishing vessels are first in the UK to be successfully certified to the Responsible Fishing Vessel Standard (RFVS).
- System in place to keep management up to date with employment and immigration law
- Whistleblowing system and grievance procedures in place.
- Continued support and guidance from Human Resources Advisor and Health and Safety Advisor provided to all workers (directly employed and agency).

### **Supply chain**

- We have started work to identify and rate modern slavery risk associated with Tier1 suppliers considering the country in which the supplier operates, their sector and division, the number of workers and annual spending.
- Supplier Approval Agreement covers supplier commitment to comply with Lunar ethical trading standards outlined in the Lunar Ethical Trade Policy and the Modern Slavery Policy.
- To improve the process of gathering ethical information we combined the food safety and ethical questionnaires. Suppliers will be asked to complete them every 3 years.
- Data gathered from suppliers and contractors via the Ethical Questionnaire have been analysed to help us measure the risk of modern slavery in their operation.
- Where applicable, we obtain modern slavery statements from suppliers and other relevant policies and procedures they have in place in relation to human rights and tackling modern slavery.
- The Company is a 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. Sedex Members Ethical Audits (SMETA) is social auditing standard (based on the Ethical Trading Initiative Base Code and local laws) that businesses can use to assess working conditions, across the areas of labour, health and safety, environment and business ethics.

## Training for staff

Training regarding modern slavery forms an integral part of our company induction.

The modern slavery training is based on the Stronger Together guidance and includes grievance and whistleblowing procedures and the Ethical Trading Initiative Base Code. All participants receive leaflets (in their own language) with details about ways to report modern slavery, company whistleblowing line number, main contact details and reminder of the Ethical Trading Initiative Base Code. The refresher training is provided every 3 years.

Posters and information materials from Stronger Together website and The ETI Base Code in different languages are displayed around the sites.



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Sinclair Banks, General Manager

23<sup>rd</sup> June 2023

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Date