

## **Modern slavery statement for financial year 2017/18**

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Ruskim Seafoods Ltd has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Ruskim Seafoods Ltd has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

### **Our business**

Ruskim Seafoods is a family owned company, established in 1982. As one of the leading importers, distributor and wholesalers in seafood, meat and poultry in Europe. We operate from depots situated across the UK and Ireland.

### **Our policies and due diligence**

Ruskim Seafoods have a global supply chain and we source our products from five continents. We develop long term partnerships with our suppliers who share our values and who are committed themselves to our ethics code of conduct which include:

1. Anti-slavery – to ensure that employees can identify any instances of this and where they can go for help.
2. Recruitment – to ensure that our recruitment practices protect workers and ensure fair, consistent and equal treatment such that there is no discrimination in recruitment, pay or promotion decisions based on race, caste, national origin, religion, age disability, gender, marital status, sexual orientation, union membership or political affiliation. We do not use and will not recruit child labour. Our recruitment regime includes conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing - to give all workers the opportunity to raise concerns and get resolutions by following the Company's Grievance Procedure (within the Ruskim Company Handbook). Employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
4. Code of business conduct – how we behave as an organisation and how we expect our employees to act (within the Ruskim Company Handbook) and suppliers to act.
5. Temporary Labour – In addition, we ensured that any temporary labour providers we use have current Gangmasters Licensing Authority (GLA) license by checking the GLA Public Register <http://www.gla.gov.uk/our-impact/who-has-a-gla-licence/>  
<http://laws.gla.gov.uk/Default.aspx?Menu=Menu&Module=PublicRegister>

### Our suppliers

Ruskim Seafoods Ltd operates a supplier approval scheme we conduct due diligence/ risk analysis on all suppliers before allowing them to become a supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offenses relating to modern slavery independent site visits which incorporates a review of working conditions. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business;
2. They hold their own suppliers to account over modern slavery;
3. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate);
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations;
5. We may terminate the contract at any time should in any instances of modern slavery is apparent.

### Risk assessment

Overfishing and the demand for illegal fish leads to the demand for illegal, unregulated and unreported (IUU) fishing has been linked to labour exploitation. It is therefore important that use independent audits/surveys, supply chain mapping in addition to company risk assessments of suppliers.

### Training

We regularly use reputable advisors to help our buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

### Awareness and collaboration

As members of Seafish we can share knowledge and collaborative initiatives e.g. Seafish Ethics Seafood Common Language Group.

### Useful websites

Transparency in Supply Chains – A practical guide (government website)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/471996/Transparency\\_in\\_Supply\\_Chains\\_etc\\_A\\_practical\\_guide\\_final\\_.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/471996/Transparency_in_Supply_Chains_etc_A_practical_guide_final_.pdf)

[Stronger Together provides guidance resources and networks for employees to reduce exploitation](http://stronger2gether.org/resources/)  
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This statement was approved by B. Mooney, Managing Director.