

Modern Slavery Statement

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (“the Act”) and sets out the steps that has been taken and that are continuing to be taken to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. This statement refers to the actions and activities of Pelagia (UK) Limited (“Pelagia UK”), a company registered in England and Wales under company registration number 02746845. Registered office: Gilbey Road, Grimsby, DN31 2SL.

Pelagia (UK) Limited has a number of subsidiaries including Pelagia (Greenock) Limited and Pelagia (Bressay) Limited. References to “we”, “us”, “our” and “Pelagia UK” are to all of these companies. This statement applies to the financial year for Pelagia UK ending 31 December 2022.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Pelagia UK 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

Pelagia UK derives its revenues from the manufacture of marine proteins and oils from facilities in Grimsby, Greenock, Aberdeen and Shetland. Pelagia UK is a wholly owned subsidiary of Pelagia AS (“Parent Company”), a company registered in Norway. The Parent Company has similar facilities located in Ireland, Norway and Denmark and is a leading producer of pelagic fish for human consumption as well as a supplier of essential ingredients for aqua and animal feed inclusion.

The Group, headquartered in Aberdeen, produces fishmeal and fish oil from raw material which consists of whole fish and fish trimmings. There are approximately 83 full time staff employed on sites across the United Kingdom, with another 3 staff employed on a part time basis.

Our supply chain

Whole fish is purchased directly from pelagic fishing vessels or through the Norwegian fish auction via Norges Sildesalgslag. Fish trimmings are purchased as a by-product from processors and suppliers of fish for human consumption throughout the United Kingdom. We comply with all legal requirements surrounding employee rights, health and safety and ethical responsibilities.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. We are committed to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

Within our supply chain, we inform suppliers of these issues and the standards we expect them to meet.

Our suppliers

The Group operates a supplier policy and maintains an approved supplier list. We continue to conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that proposed suppliers have never been convicted of offences relating to modern slavery. All of our

suppliers are required to make a declaration that they have taken steps to eradicate modern slavery within their business; that they pay their employees at least the national minimum wage/national living wage (as appropriate) and that Pelagia Group may terminate any contractual obligations at any time should any instances of modern slavery come to light. We obtain Modern Slavery Statements from our suppliers (where applicable) and any other relevant policies and procedures they have.

Our high-risk areas

Risk assessment was carried out using the US Dept. of State Trafficking in persons report 2023 (<https://www.state.gov/reports/2023-trafficking-in-persons-report/>) as a reference document. The following risk areas were identified:

<u>Sector</u>	<u>Country</u>	<u>TVPA Tier ranking</u>
Fishing	Ireland	Tier 2
	Norway	Tier 2
	UK	Tier 1

A Tier 1 ranking indicates that a government has acknowledged the existence of human trafficking, has made efforts to address the problem, and meets the TVPA’s minimum standards. Each year, governments need to demonstrate appreciable progress in combating trafficking to maintain a Tier 1 ranking.

A Tier 2 ranking indicates that the government does not fully meet the TVPA’s minimum standards, but are making significant efforts to bring themselves into compliance with those standards.

Pelagia Group continues to believe that there is a very low risk of slavery, servitude, forced or compulsory labour or human trafficking in any part of our business or supply chains. Pelagia Group continues to review and categorise its supply chain and ensure this information is shared across UK subsidiaries.

Our performance indicators

The measures we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain are deemed effective if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

Next Steps

As Pelagia Group is committed to continuing to enhance the processes we have already established within our procurement and supply chain function we will be looking to focus on key areas of improvement in 2023. These will include:

- Incorporating Modern Slavery awareness training in our induction program; and,
- Identifying potential key risk indicators that could be implemented to assess the effectiveness of our processes.


COVID-19 Emergency Response Place

Pelagia Group has set in place steps to protect the health and safety of all our employees, contractors, and suppliers in accordance with guidance provided by authorities in each of the jurisdictions in which we operate.

Approval for this statement

The Directors of Pelagia (UK) Limited approved this statement on behalf of Pelagia UK on 30 June 2023.

Name : Michael McEllone (Director)

Signature:  _____

Date: 30/06/2023