Lunar Freezing & Cold Storage 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 to prevent modern slavery and human trafficking in our own operation and supply chain.
This statement refers to the financial year ending 31 December 2019.

Introduction

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Lunar Freezing & Cold Storage is committed to taking necessary steps to prevent modern slavery offences on our own operation and supply chain.

Structure and Supply Chains

Based in the fishing ports of Peterhead, Fraserburgh and Aberdeen, Lunar Freezing & Cold Storage are in a commanding position to supply herring, mackerel, blue whiting and whitefish products from catching to final delivery worldwide.

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.

We have manufacturing sites in Peterhead, Fraserburgh and Aberdeen supplying whole fish, machine cut and hand cut fish to our customers.

We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Our zero-tolerance approach to modern slavery has been communicated to all customers, colleagues, suppliers and all third party contacts at the outset of our business relationship with them and reinforced as appropriate thereafter.

Policies on Modern Slavery

In order to check compliance with the current legislation and the Modern Slavery Act 2015 we have reviewed policies and procedures related to the modern slavery:

- Modern Slavery Policy
- Corporate Social Responsibility Policy
- Ethical Trading Policy: based on Ethical Trading Initiative ethical code
- Whistleblowing Policy
- Anti Bribery Policy
- Grievance Policy

All those set out the standards that we expect to be in place throughout our supply chain as well as in our own operations.

In 2019 we have reviewed our Supplier Approval Agreement and from now on supplier commitment to the Ethical Standards forms an integral part of it. We seek to develop long term relationships with our suppliers who share our ethical standards.

Risk Assessment and Due Diligence Process

As a core element of due diligence process we have mapped and reviewed our stakeholders and supply chain. We have conducted the Human Rights impact assessment which measured business direct, indirect and potential impacts on Human Rights. Our commitment to respect Human Rights has been communicated to the relevant stakeholders.

We have reviewed our Ethical Self Questionnaire and the revised version will be issued to all our suppliers in 2020. Collecting, monitor and analyse this data help us measure risk of modern slavery within their business.

We are committed to responsible sourcing and to the Responsible Fishing Scheme (RFS). RFS certification covers audit on internationally recognised universal standards, including the United Nations Universal Declaration of Human Rights and its Protocols.

We are members 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 suppliers ethical audits and self-assessment details. Our sites are subject to Sedex Members Ethical Audits which helps us to improve on ethical standards within our own operations.

We have well-establish relationship with all our labour providers. They work closely with The Gangmasters and Labour Abuse Authority and with The Association of Labour Providers. Annual labour providers audit forms an integral part of our commitment to tackle modern slavery within our own operation. We are regularly assessing the audit format to ensure it meets the current ethical stands. During the audit we are reviewing labour providers compliance with the Ethical Trading Initiative Base Code and measure their year-on-year improvement. Confidential workers interview forms an integral part of the annual audits.
We work closely with our labour providers to design a framework to raise awareness in regards to modern slavery and to tackle potential issues.

As a part of due diligence process we are working closely with Employees Representatives to increase awareness about modern slavery and its reporting.

Training for staff

Our Group HR Administrator attended the Stronger Together workshop on Tackling Modern Slavery in UK Businesses. As a result of that, the new induction programme has been developed which puts greater pressure on issues related to modern slavery.

All staff has received training on grievance procedure and the whistleblowing policy. Copies of both are displayed on the notice boards. Resources from the Stronger Together website are displayed across all Lunar sites and relevant leaflets are provided during induction process.

Management at all levels are responsible for ensuring those reporting to them understand and comply with the Modern Slavery policy and are given adequate training on it.

COVID-19 Emergency Response Plan

During the coronavirus pandemic Company took several steps to protect health and safety and wellbeing of workers in our supply chain and support our suppliers during this time.

Sinclair Banks, General Manager 05 May 2020