

## Modern Slavery Statement

This statement is published to fulfil the Modern Slavery Act enacted by the British Parliament on the 26<sup>th</sup> of March 2015. It states Royal Greenland's view on modern slavery and our group activities made in the years of 2016 – 2022 to prevent modern slavery and human trafficking in our business and supply chain.

### Our organization & supply chain

Royal Greenland is a global Greenlandic government owned company headquartered in Nuuk, Greenland. We produce high quality seafood and own the entire supply chain from catch to retailer on several of our main products, but we also trade seafood from trusted suppliers around the globe e.g. Eastern Europe, Asia and South America.

### Our view

Royal Greenland acknowledges the risk of modern slavery and human trafficking in businesses and supply chains around the globe and denounces from any such acts in both our own business as well as in our supply chain.

### Our policies and procedures

Basic human rights as outlined by the United Nations and the International Labour Organization (ILO) as well as denouncing modern slavery is clearly outlined in the Royal Greenland Code of Conduct for employees and the same requirements are passed on to our suppliers and sub suppliers in the Supplier Code of Conduct.

### Due diligence processes

In Royal Greenland, we have established due diligence processes related to modern slavery and human trafficking by risk evaluating suppliers and their country of origin. Whenever trading within countries of risk, we demand that our suppliers not only sign the Supplier Code of Conduct outlining our stake on modern slavery and human trafficking, but also to self-asses their sustainability and human rights performance.

### Progress in 2017

- Updated risk assessment & implementation in our Ethical supplier management system.
- Goal reached 100% high and medium risk 1st tier suppliers have signed and self-assessed against the Royal Greenland Supplier Code of Conduct.

## CATEGORIZATION OF SUPPLIERS

### Low risk:

- Sign Supplier Code of Conduct

### Medium Risk:

- Sign Supplier Code of Conduct
- Self-evaluation questionnaire

### High risk:

- Sign Supplier Code of Conduct
- Self-evaluation questionnaire
- New requirement from 1. January 2023: **SMETA audit or similar third party audit**

### **Progress in 2018**

- Internal E-learning carried out on the ethical supplier management program, explaining modern slavery.
- Goal carried on: 100% high and medium risk first tier suppliers have signed and self-assessed against the Royal Greenland Supplier Code of Conduct.
- Low risk suppliers' response rate increased from 59 % to 69%
- Assessment begun on second tier high and medium risk suppliers in main industries.

### **Progress in 2019**

- 9 second-party ethical audits carried out in high risk countries targeting human rights, modern slavery, H&S and environmental practices at the supplier's physical sites.
- New Sustainability Program accepted by the CSR steering board which increases the demand on high-risk suppliers to Royal Greenland; They must deliver a third-party Ethical audit before 2022.

### **Progress in 2020**

- The Sustainability program, as a part of the business strategy North Atlantic Champion, is implemented and communicated internally to managers and employees, and externally to customers.
- Find our modern slavery statement at <https://www.royalgreenland.com/sustainability/Programme-and-framework/policies-and-publications/>

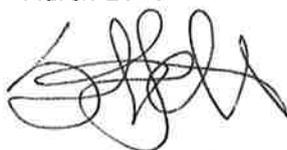
### **Progress in 2021**

- Whistle-blower report system updated to an online tool managed by an external lawyer.
- Requirement is set to suppliers of raw material and finish goods in high risk countries to be audited according to a third party ethical standard like SMETA latest at 1<sup>st</sup> of January 2023
- Royal Greenland supplier management system continues and development in the Supplier Code of Conduct is ready for implementation in 2022.

### **Progress in 2022**

- Royal Greenland Supplier Code of Conduct is updated in January 2022 with requirements to recruitment of employees, climate awareness and requirements on ethical audits to supplier in high risk countries.
- 45 minutes on-line training of managers in handling against corruption situations, power abuse and how to use the whistle-blower system.

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