

NOCA Canadian Seafood Buyer, Inc

DBA Suncoast Seafood Inc.

87 Chemin Quai-Cap-Cocagne, Grande Digue, NB, E4R 4H7

DBA Raymond O'Neill & Sons Fisheries Inc

221 Escuminac Point, Escuminac, NB, E9A 1V6



BILL S-211 - STATUTES OF CANADA 2023 - CHAPTER 9

An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff

Available on the Senate of Canada website at the following address: www.sencanada.ca/en or [An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff](#) .

Modern Slavery Statement for the Financial Year ended 2023

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This statement outlines the approach and initiatives by NOCA Canadian Seafood Buyer, Inc. to identify and address the risks forced labour and child labour in its business operations and supply chains during the financial year commencing January 2023 and ending December 2023. NOCA Canadian Seafood Buyer, Inc is committed to respecting human rights and ensuring our supply chain is free from forced labour and child labour.

Group Structure

NOCA Canadian Seafood Buyer, Inc was established on October 13, 2021. It trades under the business names Suncoast Seafood Inc and Raymond O'Neill & Sons Fisheries with its head office at 87 Chemin Quai-Cap-Cocagne, Grande Digue, NB, E4R 4H7.

- NOCA Canadian Seafood Buyer, Inc was created when ACON Investments, a US Based Company purchased the above-mentioned companies in 2021.
- The businesses were amalgamated under one business name and roll up to a US based company, Atlantic Sustainable Catch.
- Suncoast Seafood was founded in 2010 and is the Canadian headquarters for NOCA Canadian Seafood Buyer, Inc.
- Raymond O'Neill & Son Fisheries was founded in 1983 and was family owned until its sale in 2021.

Supply Chain

NOCA Canadian Seafood Buyer, Inc. purchases lobster from various lobster brokers in New Brunswick, Nova Scotia, Prince Edward Island and Maine, US. These products are shipped by these vendors to both locations. The lobster is processed and packaged for distribution to our US partner, Northern Wind, LLC as well as sold directly to customers in Canada and the United States and shipped by 3rd party freight companies.

Risks in Supply Chain

NOCA Canadian Seafood Buyer Inc. is firmly committed to respecting human rights and ensuring that no forced labour or child labour is present in any part of our supply chain. We strive to maintain the highest ethical and sustainability standards in all our operations and supplier relationships.

- Procurement of seafood and the use of intermediaries: Procuring seafood through intermediaries can present risks of forced or child labour due to a lack of direct oversight at specific points in the supply chain.
- Use of temporary, seasonal labour: The employment of temporary and seasonal labour in seafood production could involve risks of labour exploitation, including unfair working conditions and the misuse of minors.
- The geographical spread of suppliers: Our suppliers' geographical dispersion in regions with varying labour regulations can complicate monitoring and compliance with human rights standards.

Actions Taken

NOCA Canadian Seafood Buyer Inc. has established clear and robust policies regarding human and labour rights. Our commitment includes the strict prohibition of forced labour and child exploitation and the promotion of safe and dignified working conditions for all employees within our supply chain.

Our supplier agreements include a code of conduct that mandates compliance with all applicable labour laws, including the prohibition of child and forced labour.

All employees receive continuous training on the risks associated with forced labour and child exploitation within our supply chain. Additionally, new suppliers undergo a rigorous selection process that includes risk assessments and training on our human rights compliance expectations.

We are active members of several organizations that combat forced and child labour, such as the Fair Trade (FD).

Risk Assessment

NOCA Canadian Seafood Buyer Inc. has implemented comprehensive policies to mitigate the identified risks, including third-party audits, supplier evaluations, and anonymous reporting mechanisms. These policies are designed to proactively identify and address any indications of forced or child labour.

- We are implementing annual questionnaires for our suppliers to assess their compliance with our human rights standards.
- To date, we intend to conduct on-site audits and interviews with employees at various points in our supply chain.

Remediation

If forced or child labour is identified, NOCA Canadian Seafood Buyer Inc. will implement immediate remediation measures, including terminating contracts with offending suppliers and collaborating with specialized organizations to protect and rehabilitate victims. We follow the guidelines established in the Modern Slavery Remediation Policy published by Lush.

Training

We provide ongoing employee training on our policies against forced and child labour. This includes annual training and awareness campaigns to ensure everyone is informed and prepared to identify and address these risks.

Effectiveness Assessment

To assess the effectiveness of our policies, we have implemented several Key Performance Indicators (KPIs). These include the number of employees trained, the number of suppliers informed about our modern slavery policies, and the number of audits completed. These KPIs allow us to measure and improve our practices continuously.

Sign off

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending December 1, 2023. It has been issued on behalf of NOCA Canadian Seafood Buyer, Inc. and approved by the board of directors.

Signed,



Luc Doiron President



Pam Perrot Vice President – Operations



Ted Brown Vice President – Finance

Dated May 31, 2024