



**The Scottish
Salmon Company**

Modern Slavery & Ethical Trading Policy

Incorporating Modern Slavery Policy Statement

Updated January 2022

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1. POLICY STATEMENT

The Company is committed to ethical trading and 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 and combat against any form of modern slavery taking place within the business or our supply chain.

These systems and controls apply to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

2. KEY PRINCIPLES

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. This policy reflects our commitment to acting with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery or human trafficking is not taking place anywhere in our supply chains. The company operates within the Ethical Trading Initiative (ETI) Base Code:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected (although no collective bargaining agreements are currently in place)
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided
- No harsh or inhumane treatment is allowed

3. RESPONSIBILITIES

The Senior Leadership Team has overall responsibility for ensuring these policies comply with our legal and ethical obligations, and that all those under our control comply with it.

The Managing Director and his team have primary and day-to-day responsibility for implementing these policies, monitoring their use and effectiveness, dealing with any queries about them and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with these policies and are given adequate and regular training on them and the issue of modern slavery in supply chains.

You are invited to comment on these policies and suggest ways in which they might be improved. Comments, suggestions and queries are encouraged and should be addressed to Ian Laister, Managing Director – ian.laister@scottishsalmon.com.

All employees must read, understand and comply with these policies.

4. ACCEPTABLE BEHAVIOUR

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of these policies.

5. PROCEDURE FOR DEALING WITH COMPLAINTS

You must notify your manager, a more senior manager or your local HR contact as soon as possible if you believe or suspect that a conflict with these policies has occurred, or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains of any supplier at the earliest possible stage.

If you feel unable to report your concerns internally you should report it in accordance with our [Whistleblowing Policy](#) as soon as possible.

We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery in whatever form is or may be taking place in any part of our own business or in any of our supply chains.

APPENDIX 1 – MODERN SLAVERY STATEMENT

Introduction

The Company is committed to ethical trading and 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 and combat against any form of modern slavery taking place within the business or our supply chain.

These systems and controls apply to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This statement refers to actions and activities for the financial year 1st April 2021 to 31st March 2022.

Organisational Structure

The Scottish Salmon Company (SSC), part of the Bakkafrost Group, is the leading producer of the finest quality Scottish salmon. We employ over 650 staff across 60 sites on the West Coast of Scotland and Hebrides with our Head Office in Edinburgh. We are fully engaged in all stages of the value chain; from freshwater and marine farming through to processing and sales.

Our Supply Chains

Our internal supply chain extends from salmon egg selection and hatching, through on-growing in fresh water and then sea water, to harvesting, processing and packing. The internal supply chain is supported by logistics from a number of suppliers, including feed, well-boats and haulage. The external supply chain provides all of the goods and services required by a modern aquaculture organisation, from major items of infrastructure & equipment to every-day consumables.

Our Policies On Modern Slavery and Ethical Trading

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. Our Modern Slavery & Ethical Trading Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery or human trafficking is not taking place anywhere in our supply chains.

We are a member of SEDEX and conform to the Ethical Trade Initiative (ETI).

Due Diligence Processes For Modern Slavery and Ethical Trading

As part of our initiative to identify and mitigate risk we will audit our suppliers through regular self-assessment on a priority basis, as highlighted by the level of spend and the complexity of their supply chain. This will be through SEDEX for our strategic suppliers with an annual spend of £1M or above, representing around 80% of our cost base. All other suppliers will be risk assessed through our Supplier Self-Assessment Audit.

We have in place systems to:

- identify and assess potential risk areas in our supply chains through our procurement and tender process;
- ensure all new suppliers are questioned on their SEDEX membership and compliance with Modern Slavery Act 2015 in onboarding and within pre-qualification questionnaires for major spend tenders;
- mitigate the risk of modern slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains; and protect whistle blowers.

Supplier Adherence To Our Values and Ethics

We have zero tolerance to modern slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our ethics we have in place a rigorous supply chain compliance programme using SEDEX membership and self-audit. This programme is reviewed on an annual basis.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to our relevant employees. We also require our business partners to provide training to their own employees, suppliers and providers and to provide evidence of SEDEX membership and confirmation of compliance with the Modern Slavery Act.

Our Effectiveness In Combating Modern Slavery and Human Trafficking

We audit using the following key performance indicators (KPIs) to measure how effective we have been to ensure that modern slavery and human trafficking is not taking place in any part of our business or supply chains:

- % of Suppliers covered by SEDEX or the SSC Ethical Trade Audit
- % of Suppliers reporting non-conformances
- results by spend segment and areas of non-compliance vs policy segments
- % of non-conformances overall

Further Steps

Following a review of the effectiveness of the steps we took in 2020 to ensure that there is no modern slavery or human trafficking in our supply chains we intend to continue to monitor and track SMETA Audits across our Strategic Suppliers.

This voluntary slavery and human trafficking statement is made in connection with section 54(1) of the Modern Slavery Act 2015, for the financial year ending 31st March 2021.

Regin Jacobsen

APPENDIX 2 – SUPPLIER SELF ASSESSMENT - AUDIT

Question Number	Description
1	Supplier Name
2	Location of site
3	Postcode of site
4	Annual turnover in GBP
5	Country and region of production
6	Products / Services supplied
7	Is all your production performed on own sites? If no where does production occur
8	Is any work sub-contracted out to other suppliers?
9	Is any finished product sourced from other suppliers?
10	Number of workers in company?
11	Type of workers and number (Permanent, Agency, Temp)
12	If you use other types of worker than Permanent staff, why is this necessary?
13	If you use Temp or Agency workers, why is this necessary?
14	Can contracts be shown for every direct employee and are these signed by employee and employer?
15	What measures are in place to control gang masters? (Gangmaster is someone who employs and directs the labour of temporary or migrant labourers)
16	Are workers required to lodge deposits or ID papers with the employee? Do they have the right to leave after giving reasonable notice?
17	Do family and dependents have the right to off-operation employment?
18	Is every employee free to leave their place of work outside of working hours?
19	Are any employees required to live on site?
20	Are any employees not living on site discriminated against? Eg. lower pay
21	Are any employees personal documents left in your safekeeping?
22	Do you retain any part of an employee's salary for any reason?
23	Is overtime worked out of the free will of employees? Eg. freely chosen and non-mandatory
24	Have you communicated to your workers about their human rights and has this been signed by Senior Management and the employees representative? Eg. in a policy document to be signed upon recruitment
25	Does the person responsible for H & S, good social practice and the elected employee representatives have knowledge about / access to recent national labour regulations?
26	Do you have a copy of the ETI Code of Practice for Socially Responsible Sourcing?
27	Is this briefed out to staff?
28	What is your policy on employing children and young people?
29	What is the minimum age of employment for your organisation?
30	How do you monitor the ages of your workers?
31	For people under the age of 18, what hours do they work (eg. daytime, night shift) and what type of work do they do?
32	Do you have a documented Health and Safety policy?
33	Do you have trained Health and Safety representatives?
34	Do you have a Health and Safety committee?
35	Do workers receive Health and Safety training? If yes, with what frequency and how is this recorded?
36	Who is responsible for Health and Safety in your business?
37	Are Health and Safety procedures documented? If so are these available to workers?

- 38 Is the work place clean and safe and in line with UK / EU legislation?
- 39 What medical facilities are available on site? Eg. first aid kits, accident books, defibrillators
- 40 Do you have trained first aiders on site? How do you ensure there are adequate numbers?
- 41 Do you have adequate liability and other insurance policies to cover workers either on or off site? Please provide up to date copies of your Public Liability and Employers Liability Insurance
- 42 Do you use risk assessments for your operations to prevent accidents and injuries? If so please attach examples
- 43 Do you provide and document training in the use of machinery and chemicals? If yes does this include training in accident prevention?
- 44 Do you provide sickness benefit for all permanent employees?
- 45 Do you have fire protection and evacuation procedures? Eg. fire extinguishers, emergency exits, training in procedures and use of equipment
- 46 What is the frequency of checking these procedures?
- 47 How do you ensure lighting and ventilation are adequate for the activities carried out?
- 48 Is there a documented maintenance programme for equipment used on site?
- 49 Does all equipment have suitable protection and guards? What equipment is provided for workers protection (eg. gloves, masks, ear defenders, wrist shields)
- 50 Are all hazardous chemicals clearly labelled, and stored appropriately in a segregated fashion?
- 51 How are workers trained in safe use, storage and handling of chemicals?
- 52 Is potable water is available on site, and do workers have access to water while working?
- 53 What canteen facilities are available on site?
- 54 If relevant, what accommodation is provided for workers? Does it have adequate fire protection, ventilation, toilet facilities, hot and cold water, lighting, lockers and wash facilities?
- 55 What % of the workforce is housed on site?
- 56 Does the use of accommodation enable spouse and children to live with the worker?
- 57 If workers travel long distances to site, is transport provided for them that is compliant with legislation and regularly maintained?
- 58 Is there an equal opportunities policy on site?
- 59 How is this documented and communicated to all workers on site?
- 60 Are women and ethnic minorities represented in all areas and levels of the company?
- 61 What is the maternity entitlement for all women workers?
- 62 Is work evaluated to match workers physical and mental ability?
- 63 Do you recognise any trade unions on site?
- 64 Which unions have representatives on site?
- 65 What % of the workers are members?
- 66 Do you have a collective bargaining agreement with a trade union? If no, do you have an alternative way of negotiating with workers (eg. wages, conditions?)
- 67 Are worker committee meetings held with documented minutes? If yes how often do these take place?
- 68 What procedures are in place for either grievances or worker suggestions?
- 69 Are wages negotiated on site? If yes, is this through the union or through workers committee?
- 70 Are union or worker representatives able to carry out their functions without discrimination?
- 71 How do you ensure that you, your subcontractors or others within your supply chain do not use workers who are employed by force, bonded labour or prison labour?
- 72 What security arrangements are on site? (eg. locked gates, controlled access)
- 73 Are workers subject to any form of physical violence, discipline, abuse, harassment or any other kinds of intimidation?

74	Do records indicate full names, job description, date of birth, date of employment commencing, and wage for all workers?
75	Is this in a language understood by workers? Eg. Polish, Hungarian
76	What arrangements are made for workers who cannot read?
77	What is the legal minimum wage applicable to your company / country? In GBP per month
78	How are working times of all employees recorded? Is the breakdown between standard working hours and overtime hours transparent?
79	How are wages calculated in line with legislation?
80	How is pay calculated for basic grade workers? Eg. hourly, piecework, monthly
81	How often are workers paid and in what manner? Eg. weekly - cash, bank transfer
82	What documentation do workers receive with their wages? Eg. payslip detailing overtime, deductions, bonuses etc
83	Is this supplied in a language understood by workers?
84	What deductions are taken from workers gross pay?
85	What are the normal working hours each week? (eg. 40 hours basic)
86	How many days are worked each week? And how much overtime per week is usual per worker?
87	Is overtime voluntary? If no, how is this agreed with workers in their contracts?
88	What rate are workers paid for working overtime? Eg. Hourly x 1.5
89	What daily rest periods / break periods are given if overtime is worked?
90	Do hours / days/ overtime worked vary over the year? If yes, please detail why
91	How many days of paid leave excluding national holidays do workers receive each year?
92	Are workers obliged to work on national holidays? If so what rate are they paid?
93	Does your company have an environmental management system (typically accredited to ISO14001)?
94	Does your company have a Sustainability Policy? If so please attach copy
95	Does your company have an energy management system (typically but not exclusively accredited to ISO50001)?
96	Do you comply with the Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017?
97	Have you declared and paid tax on all income received in line with relevant tax legislation where you operate?
98	How do you comply with the UK CCO legislation regarding facilitating tax evasion?
99	Please provide an organogram of your group legal structure and advise names of any parent companies or subsidiaries
100	What country is your income being declared in?