

MODERN SLAVERY STATEMENT

Version 5. 1 April 2026

- **Introduction**

Bakkafrost Scotland 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 policies 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.

These policies do not form part of any employee's contract of employment, and we may amend them at any time.

This statement refers to actions and activities for the financial year 1st April 2026 to 31st March 2027.

- **Organisational structure**

Bakkafrost Scotland, part of the Bakkafrost Group, is the leading producer of the finest quality Scottish salmon. We employ over 400 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, ethical trading and child labour**

We are committed to ensuring that there is no form of modern slavery, including and not limited to human trafficking, the use of child and/or forced labour 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 implementing and enforcing effective systems, controls and reporting processes.

We are a member of Scotland Against Modern Slavery (SAMS), partner with Stronger Together and are SEDEX members that conform to the Ethical Trade Initiative (ETI).

- **Due diligence processes for modern slavery and ethical trading and child labour**

As part of processes 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 external strategic suppliers with an annual spend of £1M or above, representing 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. All new suppliers are questioned on their SEDEX membership and compliance with Modern Slavery Act 2015 in onboarding assessments and audits for major spend tenders. This includes ensuring all suppliers can demonstrate due diligence to monitor for child labour and ensure young workers under 18 are not employed in hazardous conditions or night work.

- **Supplier adherence to our values and ethics**

We have zero tolerance to modern slavery, human trafficking and child labour. 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.

- **Briefing on modern slavery**

To ensure a high level of understanding of the risks of modern slavery, human trafficking and/or child labour in our supply chains and our business, we brief our relevant employees. We also encourage our business partners to provide training to their own teams, 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, ethical behaviour and child labour**

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

- % of Suppliers covered by SEDEX or the BFS Ethical Trade Audit
- % of Suppliers reporting non-conformances
- % of non-conformances overall
- % compliance with RTW legal obligations and annual policy review plus training
- % compliance annual personnel file audits

- **Collaboration with External Agencies**

Both Bakkafrost Scotland and suppliers are expected to work with external agencies, such as The Gangmasters and Labour Abuse Authority (GLAA) and the Police to support remediation efforts and develop long-term solutions. Suppliers are required to cover any costs associated with any remediation plan, as deemed necessary.

- **Further steps**

Following a review of the effectiveness of the steps we took in 2021 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 2027.



Ian Laister
Managing Director