

MODERN SLAVERY STATEMENT

JULY 2021

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Aquascot

Our Statement

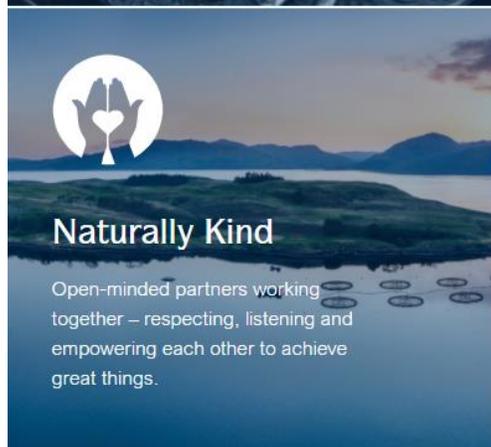
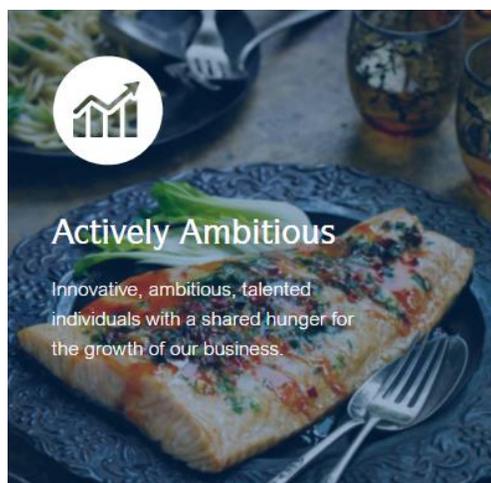
At Aquascot we take our ethical responsibilities seriously and with that strive to continuously improve our practices and corporate input into the fight against Modern Slavery. Our statement provides details of our policies, processes and actions that we have taken to mitigate the risk of modern slavery and human trafficking in our supply chains and across our business operations. It covers our Modern Slavery Statement for the financial year which ended on 31 January 2021, required under the Modern Slavery Act 2015.

The information within this statement is signed by **John Housego, Partner & Managing Director of Aquascot Ltd.**

Our Values

These set out clearly and earnestly what kind of company Aquascot are proud to be, how we approach new challenges and the qualities we embody in everything we do.

They were shaped and established by our partners' and they reflect both the company we are and the one we will continue to grow into as we continue our employee owned journey.



Our Highlights of the Year

The last year has been unforgettable, most notably due to the Coronavirus pandemic. We have faced unprecedented times over the last 12 months, and as an employee owned business we are proud of how our operations and partners have handled the challenges we have all been faced with. Some of our highlights over the last year are included below.

With over a third of partners based at home during the pandemic, we have introduced a new Homeworking Policy.

This new policy sets out our provisions to facilitate effective and efficient homeworking, whilst ensuring the Health & Safety of our partners whilst working in their home environment remains paramount. As we begin to move into the 'new normal' way of working lives we have adopted a blended home working approach for partners where their role allows.

Our COVID-19 Resilience team have ensured our partners onsite have been kept as safe as possible during the pandemic. Made up of partners across key business areas, we now have a designated team to control and manage our COVID-19 resilience within our daily operations. Measures have included daily COVID specific communications with all partners, enhanced PPE, social distancing measures, return to work controls, testing and factory design. Overall with the aim to safeguard our partners, their employment and income.

Scotland Against Modern Slavery Corporate Partnership. This year we have become a registered corporate partner with the Scotland Against Modern Slavery

(SAMS), and as we continue to support the fight against Modern Slavery and seek to improve our ethical practices, we look forward to this new partnership and utilising the insightful resources SAMS provides, whilst offering our support where possible to victims of this prevalent crime.

Increasing rates to align with the Real Living Wage. We continue to align our rates of pay with the UK government set real living wage rates, and continue to apply equal pay to all roles regardless of gender, race, age, or other characteristics.

Reward & Recognition Process launched for all partners. We have introduced a new reward & recognition process in the last year which encompasses a fair and transparent review of each individual partners contribution within the business. This process enables the recognition of individual partner contributions and ensures partners can be rewarded appropriately.

Supporting the local community. We have donated 2k to local charities and community groups in the last year, aiming to support our local community and enhance the lives of those around us. These charities cover key community areas such as mental health, youth development,

emergency responders, schools, and hospice care.

Improving partner welfare facilities. In the last year we have renovated all workplace welfare facilities at both our sites including canteens, bathrooms, and rest areas. It is important we continue to offer our partners a safe and comfortable environment to work in whilst offering facilities where they can feel rested and enjoy.

Our New Welfare Department. Up until last year our Human Resources & Health & Safety departments have been managed separately however this year we have formed our new 'Welfare' department managed solely by our Head of HR. We are excited to see this new division continue to focus on championing better work and wellbeing for our partners whilst working together to ensure partner health, safety,

and welfare remains paramount in our daily operations.

Improving our communication structure enabling partners to openly communicate with one another and work together in a shared environment. We seek to continuously improve daily communication business wide, whilst facilitating a welcoming and social environment amongst our partners. We have launched new digital platforms this year accessible to all our partners enabling us to engage with our workforce in exciting new ways.

Our Mental Health First Aiders have provided a vital aid in supporting partners during the ongoing pandemic. The aim of our MHFA team is to enhance the support we offer our partners, providing access to confidential, unbiased peer to peer support should they need it.

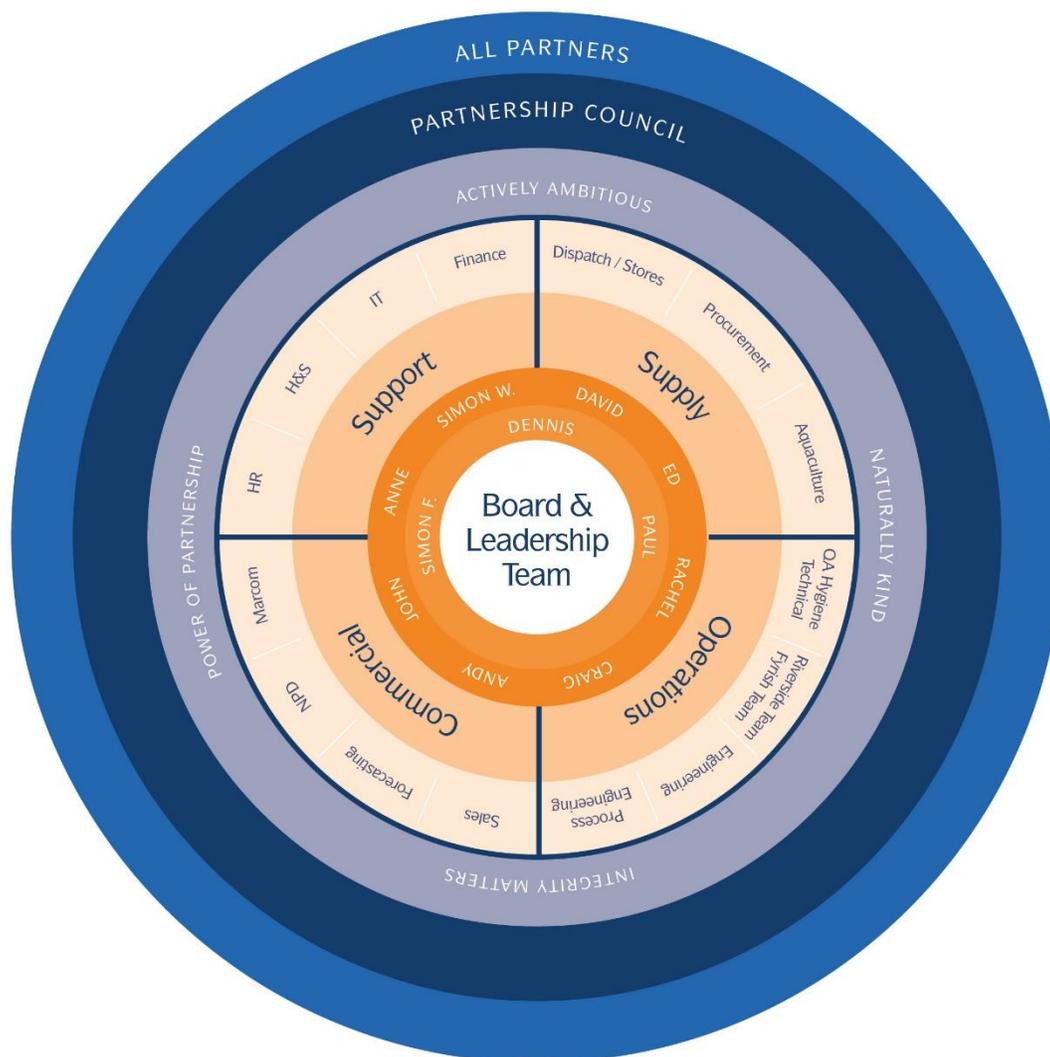
Our Business

We supply Waitrose with a wide range of different products, from whole salmon and trout including fillets for the fresh fish counter, to pre-packed 'value added' products.

We are committed to ensuring that our goods are produced without exploitation of others and that our partners, whether directly employed, contract or agency workers, are treated fairly and honestly, with respect, basic human rights and dignity. We have clear definitions of our values as a business and use these to help drive our behaviour and decision making, but we are also an Employee-Owned business through our Aquascot Employee Ownership Trust which drives our representation and accountability internally.

Our Structure

Our business has four main divisions, **Support, Supply, Operations & Commercial**. The Senior Managers from each division form our Board & Leadership Team working collaboratively as champions of our values and focusing overall on the success and sustainability of our business, including our ethical trading responsibilities.



The Partnership Council is a group of partner elected representatives who represent the interests of all our partners, meeting regularly to address new issues and upcoming projects or activities and working closely with the Board & Leadership Team. It holds representation on the Aquascot Board and the Aquascot Trust, with partners elected from the PC as non-executive directors to ensure there is a healthy flow of communication throughout.

The Partnership Council strengthens our purpose as a business and ensures partners are always represented, ensuring the long term sustainability of Aquascot.

Our Supply Chain

Ethical Trading throughout our supply chain is viewed as a high priority. We are entrusted to ensure high standards of supply chain working conditions, and we need to ensure that we work in collaboration with suppliers, and customers, to meet and exceed these expectations. We work in partnership with our fish supply network conducting 'Responsible Efficient Production Assessments', reviewing worker's rights and well-being on sea farms throughout Scotland. As a specialist supplier to Waitrose we align our ethical standards to be at parity with or exceed their requirements but also work in partnership with them in the development of practical ethical standard improvement across our supply chain and industry.

We are members of Sedex, the Ethical Data Exchange, which is a member organisation for businesses committed to continuous improvement of the ethical performance of both our internal partners as well as our external supply chains.

Our Policies

Human Rights Policy

Our Human Rights Policy demonstrates our commitment to the maintenance, evaluation and continuous improvement of standards as set out in National and International laws, the International Labour Organisation conventions as well as our own customers' codes of practice. This policy addresses key areas such as employment of children and young people, security, working conditions and benefits associated with employment, and equality of treatment, representation as well as environmental and aquaculture fish welfare.

Whistleblowing Policy

We are committed to conducting our business with honesty and integrity and we expect all partners to maintain high standards. Whistleblowing is the reporting of suspected wrongdoing or dangers at work including bribery, fraud or other

criminal activity, miscarriages of justice, health and safety risks, damage to the environment and any breach of legal or professional obligations. We provide all partners with access to our independent, confidential whistleblowing hotline and online reporting system with the additional option to make any report anonymous if a partner wished to do so. Our policy also includes the measures we take to safeguard any whistleblower ensuring they suffer no detrimental treatment as a result of raising a genuine concern.

Equal Opportunities Policy

Our policy focuses on promoting equal opportunities in employment. Any job applicants will receive equal treatment regardless of age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion or belief, sex or sexual orientation (Protected Characteristics). Our policy sets out our

approach to equal opportunities and the avoidance of discrimination at work. It applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment.

Anti-Harassment & Bullying Policy

We are dedicated to providing a working environment free from harassment and bullying and ensuring all partners are treated, and treat others, with dignity and respect. Our policy covers harassment or bullying which occurs at work and outside

of the workplace, such as on business trips or at work-related events or social functions. It covers bullying and harassment by any partner (which may include consultants, contractors and agency workers) and also by third parties such as customers, suppliers or visitors to our premises.

Anti-Bribery & Corruption Policy

It is our policy to conduct all business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all business dealings and relationships.

Our Due Diligence, Risk Assessment & KPI's

As members of Sedex, the Ethical Data Exchange, and as a supplier to Waitrose, we are committed to being externally audited (SMETA) every two years to ensure an independent and transparent monitoring process in order to receive regular feedback and make continuous improvements. In addition, we currently conduct ethical based Self-Assessment Questionnaires on all of our farming partners, including their individual farms, with the potential scope to increase this to our wider supplier network (packaging & ingredients) in the future.

Furthermore, as part of the Waitrose Farming Partnership, our Head of Human Resources, Head of Aquaculture & Aquaculture Innovation Lead are all continuously involved in the 'Waitrose Ethical Employment and Wellbeing Group'. This provides the opportunity to represent our company in the promotion of our ethical trading strategies, whilst making vital connections with other companies in the same manufacturing sector, gathering evidence-based data and learning of their new innovative approaches to tackling modern slavery and human trafficking.

In addition, we audit our agency labour provider against our Human Rights Policy whilst also ensuring their compliance to the Ethical Trading Initiative (ETI) Base Code, Modern Slavery Act 2015, and Gangmaster Licensing Standards, including the active measures and steps they are taking to promote best practice within their business processes. This audit process also includes independently interviewing a selection of temporary agency workers onsite, covering their personal experiences and their knowledge of the ethical practices and services available that both the agency, and our company have in place.

Our Goals & Objectives

As an employee owned business, our partners are at the heart of everything we do, and our goal is to ensure Aquascot continues its journey in Employee Ownership, ensuring all partners have a safe, welcoming and supportive environment to work in, and opportunities to grow and develop to their full potential.

We are actively ambitious in creating a truly great place to work where our partners are rewarded fairly for the efforts and contributions they make, and where we provide encouragement and treat each other with respect and kindness.

We strongly believe that by applying and communicating our codes of practice and living our values in all that we do, in partnership with our suppliers and customers are taking practical steps towards improving the issues of ethical and responsible sourcing.

