



MODERN SLAVERY STATEMENT JULY 2023



Aquascot

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Our Statement

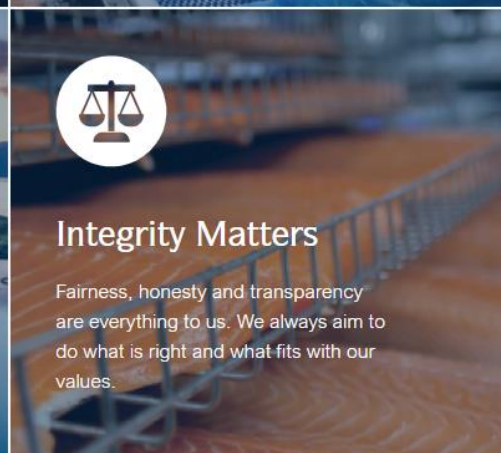
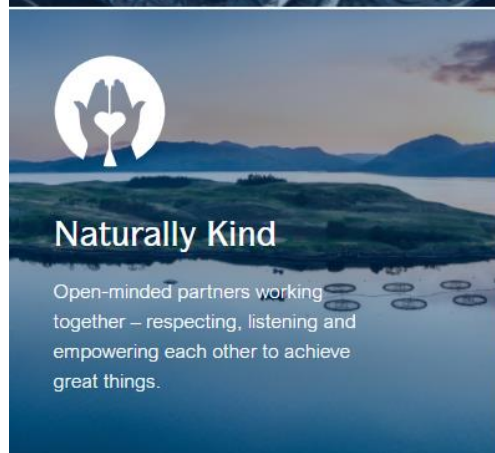
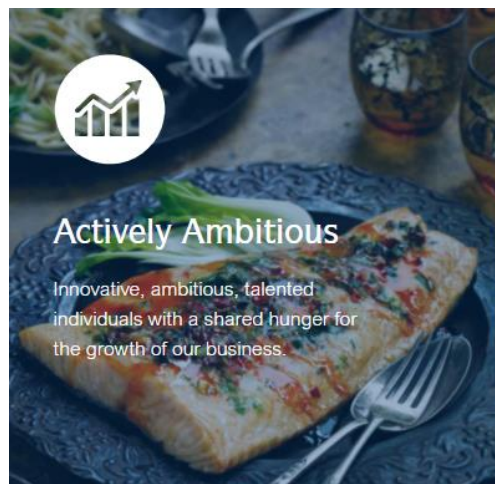
At Aquascot we take our ethical responsibilities seriously and with that strive to continuously improve our practices and corporate input into the fight against Modern Slavery. Our statement provides details of our policies, processes, and actions that we have taken to mitigate the risk of modern slavery 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 2023, 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

Over the last year we have continued to feel the aftermath of the Coronavirus pandemic and its impact on our partners health and wellbeing, and our business operations, together with the ongoing cost of living crisis, inflation, and the challenges this present across our supply chain and industry. As an employee owned business, we continue to pride ourselves in how our operations and partners continue to face into these challenges together as one team. Some of our highlights over the last year are included below.

Scottish Food & Drink Employer of the Year. In the last year we were delighted to be awarded the Scottish Food & Drink Employer of the Year award. This was an incredible achievement for us and recognition across our industry that we offer a great place to work, and whilst there is always more to be done this allowed us to celebrate the progress we have already made.

Good Business Charter Accredited. The GBC is an accreditation which organisations in the UK can sign up to in recognition of responsible business practices. There are 10 commitments which need to be maintained to reach the GBC standard, some of which include: being a real living wage employer, committing to a fair approach to zero or minimal hours contracts, having clear, fair and transparent policies that support and encourage partner wellbeing, and committing to the standards set out in the Ethical Trading Initiative (ETI) Base Code.

Partnership Council (PC), Partner Directorship & Business Mentoring Program. Our partnership council is a group of partner elected individuals that represent the interests of partners' across

our business, working in close collaboration with our leadership team, to ensure the long term sustainability of our EO business. It holds representation on the Aquascot Board and the Aquascot Trust Board, with partners elected from the PC as non-executive directors. This year we have seen new appointments to our Trust Board, with all Non-Exec. partners further supported through our business mentoring program, which includes the allocation of an external business mentor, independently assisting them in their additional role.

Scotland Against Modern Slavery Corporate Partnership. This year as a continued active corporate SAMS partner and as we continue to support the fight against Modern Slavery in seeking to improve our ethical practices, we have continued to utilise the insightful resources on offer, most notably through expanding our knowledge and understanding on the effects and presence of Modern Slavery, the various critical organisations playing a vital role in supporting victims, and what we can do further as an organisation to prevent and support victims of this prevalent crime.

Becoming a Real Living Wage Employer.

We continue to be an official accredited real living wage employer with our first year of accreditation under our belt, and with many of our partners continuing to benefit from an increase to their pay. We also continue to apply equal pay to all roles regardless of gender, race, age, or other characteristics.

Supporting our Local Community.

Despite the ongoing industry challenges and rates of inflation, we have continued to donate to as many local charities and community groups over the last year as possible. These charities include key community areas such as foodbanks, youth development including our local Highland Rugby Club U13's, emergency responders, Alzheimer's Society and Highland Hospice care.

Our Young Persons Guarantee. Last year we pledged our commitment to the Scottish Government Program. The scheme is aimed at employers making the commitment to support young persons in the local community through employment opportunities, and teaching new skills such as interview techniques, apprenticeship programmes, and work experience. This was an easy decision for Aquascot as it is a combination of some of our key passions: investing in young people, the local community, and becoming an employer of choice. This year we have continued our engineering apprenticeship program and continue to recruit under 18's with outreach to local academy programs & job fairs.

Cost of Living Payments to all our

Partners. In recognition of the challenging times we are all facing around the current cost of living crisis, we have continued to provide ongoing monthly cost of living payments this year in addition to standard pay to our partners. The aim being to continue to provide partners with further support and recognition of these challenging times.

Hybrid Working continues to promote a healthy work life balance among our

partners. This year, in line with our Homeworking Policy, we again continue to empower partners to manage their own workload with a flexible onsite/offsite approach for those with job roles that facilitate it. We recognise the continued positive effects on partner wellbeing, welfare, and productivity, and have continued to offer this flexibility putting partners in control of their own job.

Common Language Project. We are proud to have an ethnically diverse workforce, with over 55% of our partners non UK nationals, therefore we continue to seek new ways to build on our values and strengthen our team. In the last year the first cohort of fully funded English language classes have successfully completed their course, some of which have gained such further confidence in their language skills they have now recently commenced their fully funded SVQ in food safety. We are delighted to support our partners in this way, enhancing their personal and work life through communication, and look forward

to supporting the next cohort in the coming year.

Our Mental Health First Aiders. This year we have invested in refresher training courses for our MHFA team who continue to provide a vital aid in supporting partners during the aftermath of the pandemic and more recently the cost of living crisis and the pressures this puts our partners under. 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. In the last year we have taken part in several campaigns covering topics such as Suicide Prevention, understanding Mental Health conditions, Eating Disorders, Self-Harm and Stress.

Scotland for Employee Ownership.

Two partners from our leadership team represent Aquascot on the industry leadership group, Scotland for Employee Ownership, which is co-chaired by the Minister for Business, Fair Work and Skills and has the aim of increasing the number of employee owned business to 500 by 2030. As part of its enabling and influencing remit this forum has been helping raise the profile of Employee Ownership and the benefits this has for those who work in these businesses. As part of the fair work progression, including Community Wealth Building, this has been recognised and policies are being implemented to encourage further uptake in Employee Ownership.

Healthy Working Lives. Over the last 10 years we have held the Healthy Working Lives award, however in the last year have seen this awarding body adapt their services to remove the award process and replace it with valuable resources and support with the focus to support businesses in their efforts to facilitate a health promoting workplace, and to improve the health of its workers. Despite the award no longer running, we continue to hold ourselves accountable to promote health working lives for all our partners. We continue to offer free fresh fruit daily, run our cycle to work scheme, and offer subsidised membership with Highlife Highland giving partners access to health and leisure facilities across our local area.

Our Better Jobs Survey. As one of our ongoing KPI's our Better Jobs Survey participation levels increased further this year to 72%. The feedback from our partners included them seeing a greater level of teamwork in practice across the business, and our more recent Reward and Recognition program being viewed as a great move towards better recognising partner contributions. Lastly it was recognised that 99% of partners have either a full or part time permanent employment contract, with 88% stating they were either working at the right level or have the opportunity to do more.

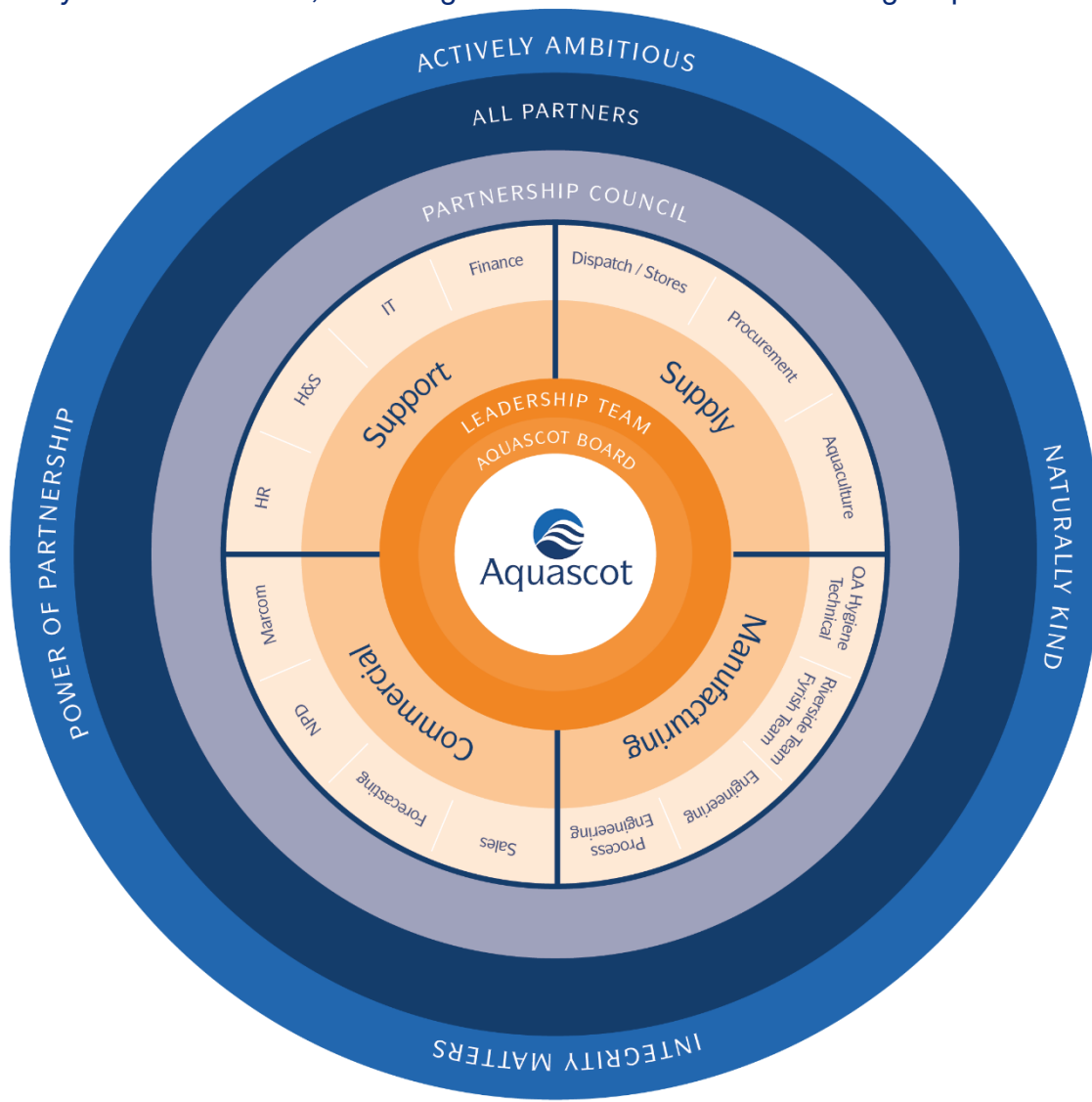
Our Business

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, contracted 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, and as 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, Manufacturing & 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.

In addition, with our Roundtable of Sustainable Palm Oil (RSCO) Certification, a scheme which is focused on preventing the exploitation of workers, deforestation and destruction of endangered species' habitats. All our ingredients that contain palm oil or palm kernel oil are now sourced only from suppliers which hold the RSPO-segregated supply chain standard, ensuring the integrity of the palm oil supply chain. You can check our progress at: <https://rspo.org/members/14701>

We are also 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, structured around the ETI Base Code, addresses key areas such as employment of children and young people, security, working conditions, equality, and health, safety, and welfare standards.

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 whistle-blower 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 were committed to being externally audited (SMETA) every two years to ensure an independent and transparent monitoring process to receive regular feedback and make continuous improvements since 2016, however this year again, with a derogation from Waitrose, alternatively we participated in our third year of running the Waitrose driven Better Jobs Survey initiative. The survey was broken into 7 categories: Voice, Respect, Health & Wellbeing, Reward, Growth, Security, and Job Design, giving our partners a further channel to voice their feedback, ideas, and opinions to highlight what we did well, and where our opportunities are to improve further. In addition, we currently conduct ethical based Self-Assessment Questionnaires on all 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, and Head of Aquaculture are 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 providers 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.

