



Aquascot

MODERN SLAVERY STATEMENT

JULY 2024

Produced by Stacey McFarlane, HR Partner

Our Statement

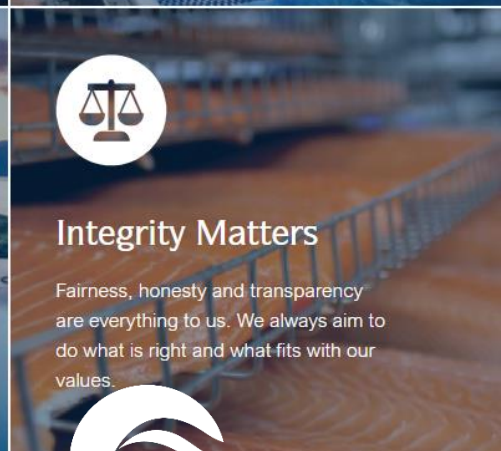
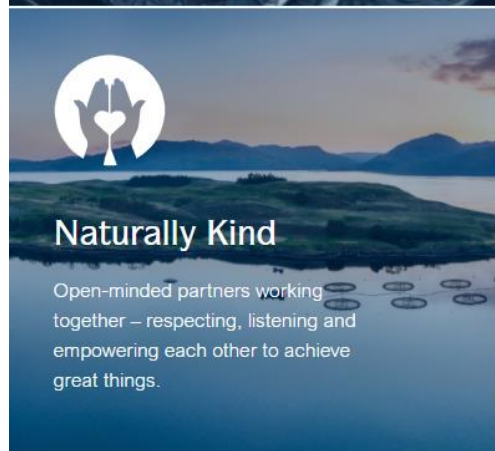
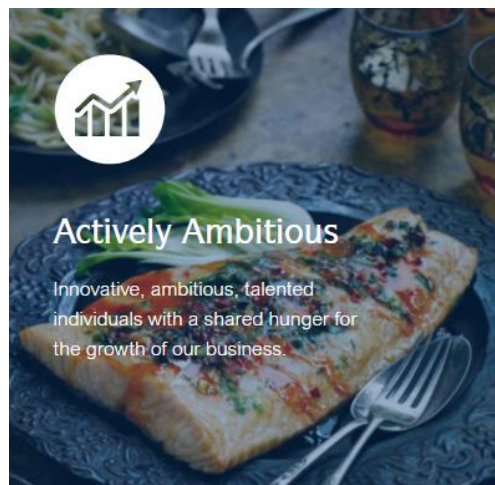
At Aquascot we take our ethical responsibilities seriously and with that strive to continuously improve our practices and corporate input into the fight against Modern Slavery. Our statement provides details of our policies, the processes, and the actions we have taken to mitigate the risk of modern 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 2024, 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 effects of the cost of living crisis and its impact on our partners health and wellbeing, and our business operations, and the challenges this continues to present across our supply chain and industry. As an employee owned business, this year we continued to pride ourselves in how our operations and partners face into these challenges together as one team. Some of our highlights over the last year are included below:

Remaining a Real Living Wage Employer.

Despite the ongoing industry challenges and rates of inflation over the last year, it was critical that we continued as an accredited real living wage employer to ensure our partners receive a fair and real living wage when they need it the most, and with many of our partners continuing to benefit from the further increase to their pay this was such an important decision. We also continue to apply equal pay to all roles regardless of gender, race, age, or other characteristics.

Record Investments in our Factory

Infrastructure. In 2023 we made some of the largest investments in new equipment in our history. Implementing new machinery and new methods of manufacturing were not without their challenges, however through the incredible hard work and efforts of our partners and teams they landed successfully. These significant investments were made as part of our bigger ambitions to become a leading processor, and to provide a sustainable working environment for our partners. By upgrading our infrastructure so significantly, we aim to enhance our throughput whilst empowering our partners to put their knowledge, passion, skills and

experience to better use, stepping away from manual processing and towards the future, creating a new efficient factory and putting our partners in control.

Supporting our Local Community. We have continued to support and donate to as many local charities and community groups as possible. Over the last year our key charities included community lifeline groups such as local foodbanks, youth wellbeing and development support groups, emergency first responders, and local mental health charities, all of which are providing vital daily resources to support our local communities including our partners and their families. For Aquascot having an opportunity to support these incredible charities and groups is a privilege, especially during these current economic times.

Our Young Persons Guarantee. We continue to pledge 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 continued our engineering apprenticeship program and to recruit under 18's with outreach to local academy programs & job fayres.

Reorganisation of our Welfare Teams.

Following the departure of our longstanding head of our welfare teams (Human Resources and Health & Safety) we have taken the opportunity to reshuffle our teams in order to empower our existing welfare focused partners and refocus our efforts in a new dynamic structure. By putting the knowledge of our experienced teams at the forefront of our long term goals this brings a fresh new perspective and approach to our health, safety and welfare practices and ambitions for the benefit of our partners and our business.

Hybrid Working & Promoting a Healthy Work Life Balance.

This year, in line with our Homeworking Policy, we again continued 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 flexible approach, putting our partners in control of their own job.

Our Mental Health First Aiders. This year our MHFA team have continued to act as a vital aid in supporting our partners during

the cost of living crisis and the pressures this is putting our partners under, along with support for any other challenges in life our partners are facing. The MHFA team enhance the support package we offer our partners, providing access to confidential, unbiased peer to peer support should they need it. In the last year we have continue to take part in the promotion of various campaigns covering topics such as Suicide Prevention, understanding different Mental Health conditions, Eating Disorders, Self-Harm, and Stress.

Our New Menopause Policy.

We acknowledge that transitioning through the menopause can be a difficult and stressful time for our partners, and those affected can experience symptoms that can have a detrimental impact on their work life. We are therefore committed to supporting our partners affected by menopause in practical and reasonable ways so have introduced our new Menopause policy. This policy sets out the support that we shall provide to any partner affected by the menopause or who is experiencing menopause-related symptoms including educating our management teams on the subject, and ensuring we give full consideration to any reasonable adjustments that can be made.

Our New Carer's Leave Policy. In line with recent changes in legislation, and our core values, we have introduced this policy to ensure the statutory rights of our partners in circumstances where time off work is required to provide or arrange care

for a dependent with a long-term care need are practiced and in support of our partners and their personal situations. This policy sets out our provisions in these circumstances including time off work to deal with these situations.

Scotland for Employee Ownership. Two partners from our leadership team continue to 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. Having held the Healthy Working Lives award for over a decade prior to the program itself ending in recent years, we continue to maintain the standards and utilise their initiatives and resources. With the focus to support businesses in their efforts to facilitate a health promoting workplace, and to improve the health of its workers, we

continue to hold ourselves accountable to promote healthy 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 and their families access to health and leisure facilities across our local area.

Our Cultural Partner Survey. As one of our core KPI's to measure our ambitions in becoming a Great EO business, we redeveloped our cultural partner survey in line with our values this year. We believe our values should guide how we work internally and externally, therefore our new partner survey has been structured in a manner that enables us to assess if we are living those values in the eyes of our partners. We seek to continue to develop our survey as appropriate to ensure we are effectively capturing our partners view and opinions as a crucial aspect of to our operations. Following the results of the 2023 survey each of our teams met individually to review their results and formulate the top 3 actions they wish to improve in the coming year in their respective area.

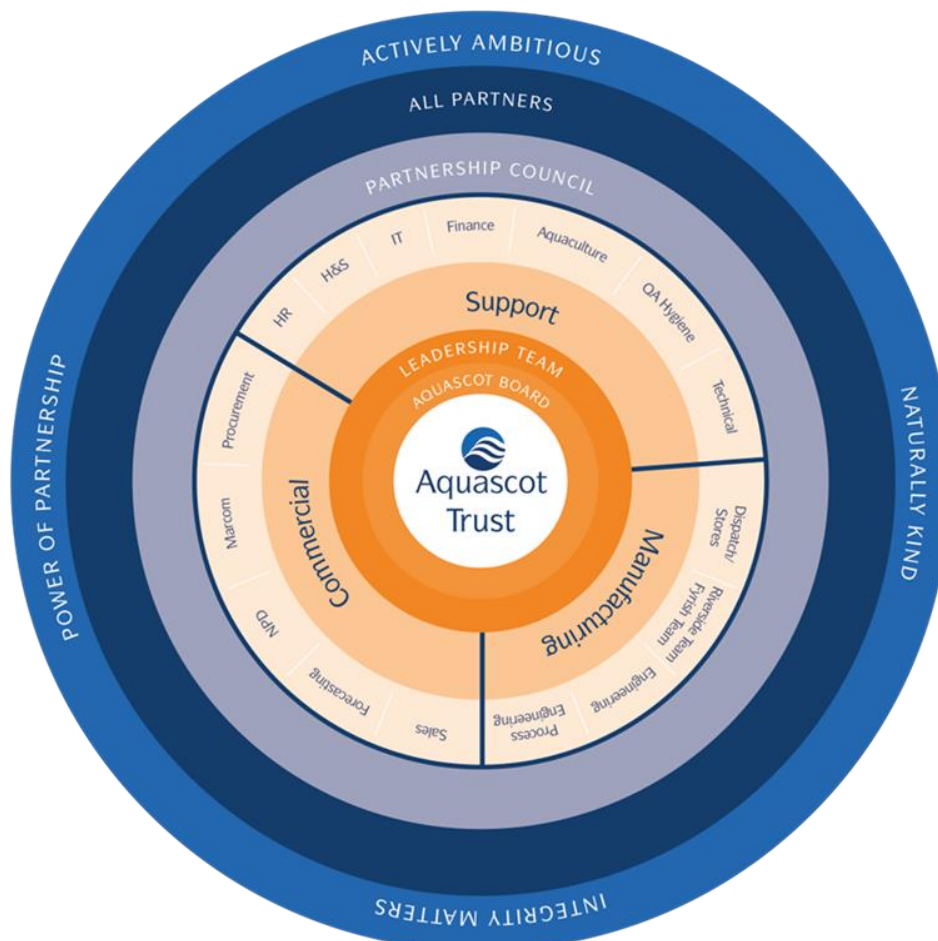
Our Business

We specialise in Salmon, Organic Salmon and Trout, supplying Waitrose with a wide range of different products including 'naked' fish such as whole fish, counter products like bulk portions, whole fillets and lightly smoked and shelf products such as 2 pack, 4 pack and loins. In addition, we also supply pre-packed ready to cook 'value added' products such as Miso Salmon & Maple Glaze, Salmon Encroute, Teriyaki Salmon Kebabs, Salmon & Sweet Potato Curry, and Asian inspired Salmon Burgers.

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 three main divisions, **Support, 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 responsibilities.



Our Partnership Council (PC) 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 our 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 guarantees partners are always represented, ensuring the long-term sustainability of Aquascot. As we are employee owned it's our partners right to a voice, a share and to be involved in the governance of our business.

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 (REP) Assessments'. These assessments are undertaken against Global GAP (Good Agricultural Practices) standards with a focus on all aspects of the safe and sustainable production of food. These standards include the review of Workers rights, wellbeing, safety and welfare, all of which are further enhanced by the GRASP (Global GAP Risk Assessment on Social Practice) framework which we also use to form part of our assessments 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, whilst also working in partnership on the development of practical ethical standard improvement across our supply chain and industry. We also 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.

In addition, with our Roundtable of Sustainable Palm Oil (RSPO) 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 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 which is a data driven member organisation for businesses committed to the continuous improvement of their ethical performance in relation to both our

internal partners as well as our external supply chains. As of this year we are now AB members of Sedex which empowers us with deeper insights into the data, resources and analytics of our supply chain. Powered by this further information on our supply chain we have commenced the development of a supplier 'ethics pack', with the concept based around our core business principles. In doing so we aim to create a full package focused on our ethical requirements, and expectations of our suppliers.

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. Within any part of our operations all workers 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.

Recruitment & Selection Policy

We make certain fair and consistent recruitment and selection practices are adopted and applied throughout the company and are in line with our Equal Opportunities Policy. Our policy ensures

practices will be non-discriminatory and will conform to all statutory regulations and best practice.

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, and as a key supplier to Waitrose, we are 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. In 2021 we had an agreed derogation with Waitrose regarding the requirement to complete 2 yearly SMETA audits. The agreement was to replace these audits with the Waitrose driven Better Jobs Survey which ran during 2020 and 2021 consecutively, followed by our own cultural partner survey in 2023. 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 2023 the SMETA derogation came to an end, meaning there was a renewed requirement to re-commence SMETA, we welcome the return of this process in 2024 and as with our previous SMETA's over the last 8 years we look forward to the insights and key learnings on how we can continue to improve which we will gain from the process, overall enabling us to benchmark the effectiveness of our ethical ambitions and practices against the ETI Base Code of Practice and the law.

Furthermore, as part of the Waitrose Farming Partnership, our Managing Director, Head of Aquaculture, and HR Team are continuously involved in the associated forums and working groups therein including the WR Fish Forum, and Waitrose Ethical Employment and Wellbeing Committee, providing a joint supplier network and ambition to improve commercial success whilst driving ethical and sustainability goals throughout our supply chains. This provides the

opportunity to represent our business in the promotion of our ethical trading strategies, whilst making vital connections with other companies in the same manufacturing sectors and industries, gathering evidence-based data and learning from and sharing new innovative approaches to ethically sustainable working practices.

In addition, we regularly audit each of 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.

As active partners with Scotland Against Modern Slavery (SAMS) since 2021, their insightful resources enable us to keep pace with the ever changing modern slavery landscape, and continue to expand our knowledge and understanding on the ongoing effects and presence of Modern Slavery across the UK and the globe, 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.

Since 2022 we have been Good Business Charter accredited, an accreditation that recognizes responsible business practices. There are 10 commitments which need to be maintained, 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. We continue to work in line, and be actively ambitious, with these standards for the benefit of all our partners, people and planet.

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.

Our long term business strategy is reflective of our goals to become a Great Employee Owned Business and Ethically Sustainable for both our people, communities, and planet. 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, whilst working in a safe and secure workplace where we all 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, we are taking practical steps towards improving the issues of ethical and responsible sourcing.

