



ANTI-SLAVERY POLICY

1.1. Introduction

The Scottish Salmon 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 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.

1.2. Organisation's structure

We farm and process salmon across the West Coast of Scotland with our head office in Edinburgh. We have over 670 employees in Scotland, although we export over 50% of our product internationally.

1.3. Our business

Our business is organised into over 60 units, comprising of Freshwater Hatcheries, Marine Farms, Processing Plants and Offices.

1.4. 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 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.

1.5. Our policies on 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 Anti-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 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.



1.6. Due diligence processes for 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 £5m or above, representing around 5% of our cost base. All other suppliers will be risk assessed through the Supplier Self-Assessment Audit found in Appendix 1.

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 and within pre-qualification questionnaires for major spend tenders.
- mitigate the risk of slavery and human trafficking occurring in our supply chains;
- monitor potential risk areas in our supply chains; and protect whistle blowers.

1.7. Supplier adherence to our values and ethics

We have zero tolerance. Suggest stop trading if any issue identified, we'd request corrective action plan and only resume trading once audited and proven to be rectified. to 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 will be reviewed on an annual basis.

1.8. 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 staff. We also require our external business partners to provide training to their own staff, suppliers and providers. SEDEX membership and confirmation of compliance with Modern Slavery Act. But not actively measured as in 'show us a certificate of training given'

1.9. Our effectiveness in combating slavery and human trafficking

By end 2019, we will publish the results of our Auditing using the following key performance indicators (KPIs) to measure how effective we have been to ensure that 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
- % with non-conformances overall e



**The Scottish
Salmon Company**

1.10. Further steps

Following a review of the effectiveness of the steps we have taken in 2019 to ensure that there is no slavery or human trafficking in our supply chains we intend to take the following further steps to combat slavery and human trafficking:

- Monitor and track the SMETA Audits across the Strategic Suppliers by end 2020

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company's slavery and human trafficking statement for the year ending Dec 2019

Craig Anderson
Chief Executive Officer
25 September 2019