



**The Scottish  
Salmon Company**

# Modern Slavery and Ethical Trading Policy

**Incorporating:  
Modern Slavery Policy Statement**

**Updated July 2020**

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# 1. MODERN SLAVERY POLICY STATEMENT

## 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 modern 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 Modern 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 modern 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 (ETI).

## 1.6. Due diligence processes for modern 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 £1M or above, representing around 80% 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;
- ensure 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 modern 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 to modern 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 business partners to provide training to their own staff, suppliers and providers and to provide evidence of SEDEX membership and confirmation of compliance with the Modern Slavery Act.

## 1.9. Our effectiveness in combating modern slavery and human trafficking

We completed an audit using the following key performance indicators (KPIs) to measure how effective we have been to ensure that modern 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
- % of non-conformances overall

## 1.10. Further steps

Following a review of the effectiveness of the steps we took in 2019 to ensure that there is no modern slavery or human trafficking in our supply chains we intend to monitor and track the SMETA Audits across the Strategic Suppliers by end of 2020.

## **2. ETHICAL TRADING POLICY**

### **2.1. Introduction**

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in modern slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

### **2.2. Employment of young workers**

It is the Company's policy not to employ workers below the Minimum School Leaver Age.

Young workers aged between 16 and 18 years old must provide relevant documentation as proof of age. Any employment contract with a young worker will incorporate the current requirements of the Working Time Directive 1998 in respect of young workers in terms of hours of work and night working.

### **2.3. Clear and fair employment practices**

All employees have employment contracts and an employee handbook exists and is available to all employees. Employment practices comply with the Working Time Directive 1998. Employment practices shall comply with the relevant current national laws including employment, immigration and social security. Obligations to employees under the above laws shall not be avoided through the use of labour only contracting, subcontracting, home working or apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

There is no forced, bonded or involuntary labour. Employees are not required to lodge 'deposits' or identity papers with the company and are free to leave employment after working their contractual notice.

### **2.4. Equal opportunities / harassment**

An equal opportunities policy exists and is monitored.

There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

Procedures are in place to respond to accusations of workplace discrimination and harassment.

## **2.5. Fair remuneration**

Remuneration should be at a rate which meets the Real Living Wage or industry benchmark standards whichever is higher.

Employees are provided with written and understandable information about their pay before they enter employment and for every instance they are paid thereafter.

Deductions from wages as a disciplinary measure does not occur and any deductions from wages not provided for by local law have the written permission of the employee concerned.

## **2.6. Employee development**

Each employee should have a performance review, which includes consideration of skills development and career prospects.

## **2.7. Overtime hours worked**

It is expected that all parts of the business will comply with the ETI provision on the maximum allowance of 12 hours per week overtime hours worked. Sites that do not currently meet these requirements will have in place a plan to achieve compliance. It is required that compliance to Working Time Directive 1998 occurs.

## **2.8. Freedom of association**

It can be demonstrated that freedom of association is respected. The company adopts an open attitude towards the activities of worker representation. Worker representatives are not discriminated against and have access to carry out their functions in the workplace.

## **2.9. Safe and hygienic working conditions**

A clear health and safety policy exists, is available to employees and evaluates and monitors employees' welfare.

Responsibility for health and safety is assigned to a senior management representative.

Employees shall receive regular and recorded safety training and such training will be available for new employees.

All employees have access to clean toilet facilities, potable water and where appropriate sanitary facilities for food storage shall be provided.

Accommodation where provided shall be clean, safe and meet the basic needs of employees.

## **3. RESPONSIBILITY FOR THESE POLICIES**

The Senior Leadership Team has overall responsibility for ensuring these policies comply with our legal and ethical obligations, and that all those under our control comply with it.

The Chief Financial Officer (CFO) and their teams have primary and day-to-day responsibility for implementing these policies, monitoring their use and effectiveness, dealing with any queries about them and auditing internal control systems and procedures to ensure they are effective in countering modern slavery. Management at all levels are responsible for ensuring those reporting to them understand and comply with these policies and are given adequate and regular training on them and the issue of modern slavery in supply chains.

You are invited to comment on these policies and suggest ways in which they might be improved. Comments, suggestions and queries are encouraged and should be addressed to the CFO.

### **3.1. Compliance with the policies**

All employees must read, understand and comply with these policies.

The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. All employees are required to avoid any activity that might lead to, or suggest, a breach of these policies.

Employees must notify their manager, the CFO or their local HR Team as soon as possible if they believe or suspect that a conflict with these policies has occurred, or may occur in the future.

Employees are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

If an employee believes or suspects a breach of these policies has occurred or that it may occur they must notify their manager, or the CFO or report it in accordance with our Whistleblowing Policy as soon as possible. Where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If an employee is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, they should raise it with their manager, or the CFO or through their local HR Team. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an employee believes that they have suffered any such treatment, they should inform their manager immediately. If the matter is not remedied, they should raise it formally using our Grievance Procedure.

Sites will be subject to a SEDEX Members Ethical Trade Audit. Any non-compliances will be highlighted by audit report to local management and detailed improvement actions with defined timescales. Non-compliant sites will be revisited 6 months post audit to ensure improvement actions have been implemented.

### **3.2. Communication and awareness of these policies**

Training on these policies, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all relevant individuals who work for us, and regular training will be provided as necessary.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **3.3. Breaches of these policies**

Any employee who breaches these policies will face disciplinary action, which may result in dismissal for misconduct or gross misconduct.

We may terminate our relationship with other individuals and organisations working on our behalf if they breach these policies.

## APPENDIX - SUPPLIER SELF ASSESSMENT - AUDIT

We acknowledge our responsibility to the Modern Slavery Act 2015 and will ensure transparency across our Business, with our Suppliers, our Contractors and Sub-Contractors.

No	Audit Requirement Description	
<b>A</b>	<b>GENERAL</b>	
1.1	Supplier / Contractor / Sub Contractor name	_____
1.2	Location of Site	_____
1.3	County and region of production	_____
1.4	Products / Services supplied	_____
1.5	Is all production done on site? If No, where does production occur?	<input type="checkbox"/> Yes <input type="checkbox"/> No _____
1.6	Is any work sub-contracted out to other suppliers?	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.7	Is any finished product sourced from other suppliers?	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.8	Number of workers: On site: _____	Total: _____
1.9	Type of workers: Total Perm: _____	Total Temp: _____
	Total Agency: _____	Total outworkers: _____
1.10	If other than permanent, why is this necessary?	_____ _____
1.11	If Temporary or Agency workers, why is this necessary?	_____ _____
1.12	<b>Contracts</b> (must be kept for 2 years) Can these be shown for every direct employee? Are they signed by employee and employer?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No
1.13	What controls are in place to manage the gang masters?	_____ _____ _____
1.14	There must be no use of forced, bonded or involuntary labour. Please confirm that you adhere to all of points (a) to (h). (a) Are workers required to lodge deposits or their identity papers with their employee and are not free to leave their employer after reasonable notice? (b) Do family and dependants have the right to off-operation employment? (c) Is every employee free to leave their place of work outside of working hours? (d) Are any employees forced to live on the operation? (e) Are any employees not living on the operation discriminated against? (f) Are any employee personal documents left in your safekeeping? (g) Do you retain any part of an employee's salary for any reason? (h) Is overtime worked out of the free will of employees? If you are unable to adhere to any of points (a) to (h) please explain why:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> No _____ _____
1.15	Have you communicated to your workers about their human rights and has this been signed by your Senior Management and the employee's representative?	<input type="checkbox"/> Yes <input type="checkbox"/> No
1.16	Does the person responsible for workers' health, safety and good social practice and the elected employee representatives have knowledge about and/or access to recent national labour regulations?	<input type="checkbox"/> Yes <input type="checkbox"/> No

No Audit Requirement Description

**B. ETI BASE CODE**

- 1.17 Do you have a copy of the ETI Code of Practice for Socially Responsible Sourcing?  Yes  No
- 1.18 Is the briefed out to the workers?  Yes  No

If No, what plans do you have to communicate this?

\_\_\_\_\_  
\_\_\_\_\_

When will this be completed by? \_\_\_\_\_

**2. PROTECTION OF CHILDREN**

- 2.1 What is your policy on employing children and young people?
- 2.2 What is the minimum age for employment with your organisation?
- 2.3 How do you monitor the ages of your workers?
- 2.4 Young people (workers under 18 years of age)

What hours do they work? \_\_\_\_\_

What type of work do they do? \_\_\_\_\_

Do they work at night?  Yes  No

How do you ensure they are working in non-hazardous conditions? \_\_\_\_\_

\_\_\_\_\_

**3. HEALTH AND SAFETY GENERAL**

- 3.1 Do you have a documented health and safety policy?  Yes  No
- 3.2 Do you have trained health and safety representatives?  Yes  No
- 3.3 Do you have a health and safety committee?  Yes  No
- 3.4 Health and safety training: Do the workers receive health and safety training?  Yes  No
- If Yes is this regular?  Yes  No
- If Yes is this recorded?  Yes  No
- If No, why not? \_\_\_\_\_

\_\_\_\_\_

- 3.5 Who is responsible for health and safety?  
Is this formalised?  Yes  No
- Are procedures documented?  Yes  No
- Are these available to all workers?  Yes  No
- If No, what plans are in place for this?

When will these plans be in place? \_\_\_\_\_

- 3.6 Is the work place clean and safe?  Yes  No

- 3.7 What medical facilities are available?  
 First aid kits  Accident books  Medical Centre  Medical insurance
- Other (please specify): \_\_\_\_\_

- 3.8 Do you have trained first aiders on site?  Yes  No
- If Yes how many? \_\_\_\_\_

- 3.9 Do you have adequate liability and other insurance that covers all workers either on or off site?  Yes  No

- 3.10 Have you completed a risk assessment of your operation which identifies and prevents accidents and injuries?  Yes  No

- 3.11 Do you provide and document training in the use of machinery and chemicals?  Yes  No
- If Yes does this include training in accident prevention?  Yes  No

- 3.12 Do you provide sickness benefit for all permanent employees?  Yes  No



**B ENVIRONMENT**

- 3.13 Do you have adequate fire protection and evacuation procedures?  Yes  No  
(e.g. fire extinguishers, emergency exits, evacuation, training in procedures and use of equipment)
- 3.14 What is the frequency of checking these? \_\_\_\_\_  
Is it documented?  Yes  No
- 3.15 Is lighting and ventilation adequate for the activities carried out?  Yes  No
- 3.16 Is there a documented maintenance programme for equipment used on site?  Yes  No
- 3.17 Does all equipment have suitable protection and guards?  Yes  No
- 3.18 Is appropriate equipment available for workers?  
(e.g. gloves, goggles, masks, ear defenders, wrist shields)  Yes  No
- 3.19 Are all hazardous chemical clearly labels and stored appropriately?  Yes  No
- 3.20 Are all workers given training in safe use, storage and handling?  Yes  No

**C FACILITIES**

- 3.21 What water is available on site? \_\_\_\_\_  
\_\_\_\_\_
- 3.22 Do the workers have access to water while working?  Yes  No
- 3.23 What canteen facilities are available on site?  
\_\_\_\_\_  
\_\_\_\_\_
- 3.24 If None, is there a clean suitable food storage area available?  Yes  No  
What accommodation is provided for workers?  
\_\_\_\_\_  
\_\_\_\_\_
- What percentage of the workforce is housed on site? \_\_\_\_\_
- 3.25 Does the use of accommodation enable spouse and children to live with the worker?  Yes  No
- 3.26 If provided, does accommodation have:  

Adequate fire protection	<input type="checkbox"/> Yes <input type="checkbox"/> No	Adequate lighting	<input type="checkbox"/> Yes <input type="checkbox"/> No
Adequate ventilation	<input type="checkbox"/> Yes <input type="checkbox"/> No	Lockers	<input type="checkbox"/> Yes <input type="checkbox"/> No
Toilet facilities	<input type="checkbox"/> Yes <input type="checkbox"/> No	Wash facilities	<input type="checkbox"/> Yes <input type="checkbox"/> No
Hot and cold water	<input type="checkbox"/> Yes <input type="checkbox"/> No		
- 3.27 If workers travel long distances, is transport provided for them?  Yes  No  
If Yes is it compliant with legislation?  Yes  No  
Are the vehicles regularly maintained?  Yes  No

**4 EQUAL OPPORTUNITIES**

- 4.1 Is there an equal opportunities policy on site?  Yes  No
- 4.2 Is this documented and communicated to all workers on site?  Yes  No
- 4.3 Are women and ethnic minorities represented in all areas and levels of the company?  Yes  No
- 4.4 What is the maternity entitlement for all women workers?  
\_\_\_\_\_  
\_\_\_\_\_
- Meets legislation     Exceeds legislation
- 4.5 Is work evaluated to match workers' physical and mental ability?  Yes  No

**5 FREEDOM OF ASSOCIATION**

- 5.1 Do you recognise any trade unions on site?  Yes  No
- 5.2 Which unions have representative on site?  
\_\_\_\_\_  
\_\_\_\_\_
- What percentage of the workers are members? \_\_\_\_\_
- 5.3 Do you have a collective bargaining agreement with a trade union?  Yes  No  
If No, do you have an alternative way of negotiating with workers (eg wages, conditions?)  Yes  No

- 5.4 Are worker committee meetings held?  Yes  No  
 If Yes are documented minutes kept of these?  Yes  No  
 If Yes how often are these meetings held? \_\_\_\_\_
- If Yes are representatives selected by management or elected by workers?  selected  
 elected  
 If No, what plans do you have to encourage dialogue with workers? \_\_\_\_\_
- 5.5 Do you have any procedures in place for either grievances or worker suggestions?  Yes  No  
 5.6 What disagreements and concerns have been resolved through this process? \_\_\_\_\_
- 5.7 Are wages negotiated on site?  Yes  No  
 If yes:  with Union  with Workers Committee  
 5.8 Are union or worker representatives able to carry out their functions without discrimination?  
 Yes  No

## 6. FREEDOM OF EMPLOYMENT

- 6.2 How do you ensure that you, your subcontractors or others within your supply chain do not use workers who are employed by force, bonded labour or prison labour? \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_
- 6.3 Do you ask workers to lodge deposits or ID papers?  Yes  No  
 If Yes what is the reason for this? \_\_\_\_\_  
 \_\_\_\_\_
- 6.4 Are employees free to leave after an agreed reasonable notice period?  Yes  No  
 6.5 Do you ask employees to work overtime without payment?  Yes  No  
 If Yes how is the worker reimbursed for their time worked? \_\_\_\_\_  
 \_\_\_\_\_
- 6.6 How do you ensure that all non-national workers are working legally within the country's law?  
 \_\_\_\_\_  
 \_\_\_\_\_
- 6.7 What security arrangements are on site? (eg locked gates, security guards, controlled access)  
 \_\_\_\_\_  
 \_\_\_\_\_
- 6.8 Are the workers subject to any form of physical violence, discipline, abuse, harassment of any kind or other forms of intimidation?  Yes  No

## 7. REMUNERATION

### A GENERAL

- 7.1 Are there records that provide an accurate overview over all employees of the farm?  
*Records must demonstrate clearly an accurate overview of all employees (including seasonal workers and subcontractors) working. Records of all employees (also subcontractors) must be accessible for the last 24 months.*  
 Yes  No  
 Do they indicate full names, a job description, and date of birth, date of entry, wage and the period of employment?  Yes  No
- 7.2 Is this in a language understood by the workers?  Yes  No  
 7.3 What arrangements are made for workers who cannot read? \_\_\_\_\_  
 \_\_\_\_\_
- 7.4 Do you keep records for all workers?  Yes  No

**B PAY**

- 7.5 What is the legal minimum wage applicable to your company / country? \_\_\_\_\_  
\_\_\_\_\_
- 7.6 Is there a time recording system that shows daily working time and overtime on a daily basis for all employees? *Working times of all employees during the last 24 months must be documented.*  Yes  No  
If Yes is the time recording system showing working hours and overtime transparent for employees and employer?  Yes  No
- 7.7 Does the company pay the wage according to works hours, gross wage restrictions and time according to the relevant current legislation?  Yes  No
- 7.8 Does the company ensure that wages paid for a standard working week meet at least legal or industry minimum standards and is always sufficient to meet basic needs of personnel and to provide some discretionary income? *Note: Use SA 8000 formula for local living wage.*  Yes  No
- 7.9 How is pay calculated for basic grade workers?  
 piece rate  hourly rate  daily rate  monthly rate
- 7.10 How often do workers receive their wages?  daily  weekly  monthly
- 7.11 How are workers paid?  cash  cheque  bank transfer
- 7.12 What documentation do the workers receive with their wages? \_\_\_\_\_  
\_\_\_\_\_
- Does this show details of hours worked, overtime, rates, deductions, bonuses etc?  Yes  No  
If No, please explain why: \_\_\_\_\_  
\_\_\_\_\_
- 7.13 Is it in a language understood by the workers?  Yes  No
- 7.14 What deductions are taken from workers gross pay? \_\_\_\_\_  
\_\_\_\_\_
- Are any of these deductions (other than statutory) without written agreement?  Yes  No

**C WORKING HOURS**

- 7.15 What are the normal working hours each week? \_\_\_\_\_
- 7.16 Do the working hours and breaks of the individual worker indicated in the time records comply with legal regulations and/or collective bargaining agreements? *Records indicate that regular weekly working hours do not exceed 48 hours. Rest breaks/days are also guaranteed during peak season.*  Yes  No  
Are the documented working hours, breaks and rest days in line with legal regulations and/or collective bargaining agreements?  Yes  No
- 7.17 How many days are worked each week? \_\_\_\_\_
- 7.18 How much overtime per week is usual? \_\_\_\_\_
- 7.19 Is overtime voluntary?  Yes  No  
If No, is this agreed with workers in their contracts?  Yes  No
- 7.20 What rate are workers paid for working overtime?  
 Hourly rate  Hourly x 1.5  Hourly x 2  Other
- 7.21 Is overtime paid to all types of workers?  Yes  No
- 7.22 What daily rest or break periods are given if overtime is being worked?
- 7.23 Do hours / days / overtime worked vary over the year?  Yes  No  
If Yes please give details of why this is so: \_\_\_\_\_  
\_\_\_\_\_
- 7.24 How many days of paid leave (excluding national holidays) do the workers receive each year?  
\_\_\_\_\_
- 7.25 How many national holidays are there? \_\_\_\_\_
- 7.26 Are workers ever forced to work on national holidays?  Yes  No  
If Yes what do they get paid? \_\_\_\_\_  
\_\_\_\_\_