

## MODERN SLAVERY POLICY

This policy statement is made in accordance with Section 54 (1) of the Modern Slavery Act 2015 and sets out the steps that the Company is committed to, to ensure that our business and supply chain are free from modern slavery or human trafficking.

### **Our Business:**

Associated Seafoods Ltd employs approximately 600 workers across 3 sites (2 in Buckie and 1 in Arbroath) supplying quality products to major brands in the UK and Globally. Our recent acquisition of the Arbroath operation has facilitated a scaling up of our operation and our people, allowing us to grow our business and respond quickly to the ever-changing demands of our customers. We are committed to ensuring the safety and welfare of all those employed by the Company, agency workers, suppliers, contractors, consultants, and other business partners. We are committed to communicating our zero tolerance, openly and transparently, with all stakeholders to ensure that our approach is shared by everyone we work with by risk assessing our own operations and supply chain.

We believe that Modern Slavery is an abhorrent abuse of the human rights of vulnerable workers which can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. Identifying victims of modern slavery can be a challenge because the crime can manifest itself in different ways. It is not always clear at what point poor working practices and lack of health and safety awareness have become instances of human trafficking, slavery or forced labour.

ASL Ltd accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

This policy applies to all individuals working for the Company or on its behalf in any capacity, including employees, directors, agency workers, contractors, consultants, and business partners.

### **Our Commitment:**

The Company has a zero-tolerance approach to Modern Slavery, encompassing human trafficking, forced labour, and domestic servitude. The Board is fully supportive of the monitoring and maintenance of the policy on all sites to ensure consistency by all levels of management when implementing. This statement will be formally reviewed and updated annually.

Slavery, forced labour, debt bonded labour, servitude, and human trafficking (which are all forms of "modern slavery") are crimes, often with tragic and traumatic consequences for those who suffer such exploitation. It is the responsibility of everyone to be alert to and vigilant in identifying both the risks and the signs of modern slavery. Associated Seafoods Ltd is committed to continuous improvement in our awareness and practices. We will work in partnership with our suppliers to prevent and eliminate any practice that may be deemed MS within our supply chains.

Where any breach is identified, the issue will be reported to the GLAA (Gang Master and Labour Abuse Authority) or Police in the UK and with the appropriate authorities within our supply chains including internationally if relevant.

### **Responsibilities:**

The Managing Director has overall responsibility for ensuring that this policy complies with the Company's legal and ethical obligations. HR has responsibility for implementing the policy, monitoring its use, effectiveness, and auditing internal control systems and policies and procedures to ensure they are fit for purpose by preventing or remediating the risk of modern slavery. HR is also responsible for investigating allegations of modern slavery in the Company's business or supply chains.

Every employee, regardless of grade or length of service must be trained to recognise potential MS and know who it should be referred to for further investigation

### **Our Policies:**

Supporting Our Modern Slavery Policy:

As an integral part of our commitment to human rights, we work to ensure that our business, our partners, and associated supply chains adhere to the highest standards of behaviours and care. We aim to proactively identify and tackle all forms of slavery and human trafficking. We ensure a consistent approach within our own operations and our supply chain and have established a "live" set of policies that will enable us to meet our commitments including

- ❖ Anti-bribery
- ❖ Dignity at Work
- ❖ Equality in the Workplace
- ❖ Ethical Standards
- ❖ Harassment and Bullying
- ❖ Human Rights
- ❖ Recruitment and Selection
- ❖ Whistleblowing

Our values and competencies are reflected in our working practices and policies, and they underpin everything we do. Our five core values describe how we work together and the behaviours we expect from everyone who works for or with ASL Ltd

Values:

Integrity, Compliance, Respect, Food Values, and Customers and Consumers are at the core of everything we do including activities to support or zero tolerance of MS

## Supply Chain Compliance:

We research and retain detailed information of our supply chain to identify potential product or geographical risks of modern slavery and human trafficking

- ❖ we will regularly review and audit all aspects of our supply chain based on their stated policies and procedures
- ❖ as a member of SEDEX, we will, where possible, check suppliers for their labour standards, compliance, and specifically for modern slavery and human trafficking. Suppliers not on SEDEX must provide a written statement to confirm that they do not have any form of slavery or human trafficking.
- ❖ we will place sanctions on suppliers who seriously violate our supplier code of conduct, including the termination of the business relationship.
- ❖ we will ensure that they hold their own suppliers to account on modern slavery and human trafficking.
- ❖ we will ensure that they pay their employees at least the national minimum wage/national living wage (UK based suppliers) or any prevailing minimum wage applicable within their country of operations (International suppliers)
- ❖ We may terminate the contract at any time should instances of modern slavery or human trafficking come to light. We only use suppliers from an approved supplier list who can demonstrate consistently that they apply the standards we expect in respect of openness and transparency in everything they do and that would bear scrutiny in a site audit.

## Training and Communication

- ❖ No reports or whistle-blower cases related to modern slavery issues have been received to date within the ASL chain but every member of staff is trained to be vigilant with MS being an integral part of our induction training.
- ❖ How to identify the signs of slavery and human trafficking including the ILO's 11 indicators of forced labour: abuse of vulnerability, deception, restriction of movement, isolation, physical and sexual violence, intimidation and threats, retention of identity documents, withholding of wages, debt bondage, abusive working and living conditions and excessive overtime.
- ❖ What steps to take if slavery and human trafficking is suspected.
- ❖ How to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.
- ❖ What external help is available through the Modern Slavery Helpline, Gangmasters Licensing Authority and Stronger Together programme. Awareness Raising in a multi-nationality by placing multi-lingual posters across our sites and translating key policies into every language used onsite.

The Stronger Together video is always accessible via [Stronger Together - YouTube](#).

## Breach of the policy

Any employee who knowingly acts in a way that breaches this policy will face disciplinary action, up to and including summary dismissal for gross misconduct.

## Modern Slavery and Ethical Trading

