

SEAFOOD ECOSSE GROUP

ETHICAL TRADING POLICY

Covering: Seafood Ecosse Ltd, Seafood Ecosse (Fraserburgh) Ltd, Macduff Shellfish (Scotland) Ltd, and all Group entities.

Throughout this policy the term “Company” refers to the relevant employing company.

1. PURPOSE

The Seafood Ecosse Group is committed to conducting business responsibly, ethically and with respect for the rights, safety and wellbeing of people working within our operations and supply chains.

This policy sets out the ethical trading standards expected across the Group and from suppliers, labour providers, contractors and other relevant business partners.

The Company is a member of Sedex (Supplier Ethical Data Exchange) and supports transparency and continuous improvement in labour standards, health and safety, environmental practices and business ethics. The Company expects suppliers and business partners to comply with applicable legislation and to take reasonable steps to ensure appropriate ethical standards are maintained throughout their own supply chains.

2. SCOPE

This policy applies across the Seafood Ecosse Group and sets the standards expected of employees, workers, agency workers, contractors, labour providers, suppliers and other relevant business partners.

Suppliers are expected, so far as reasonably practicable, to ensure that their agents, subcontractors and other organisations directly involved in supplying goods or services to the Company operate consistently with the principles of this policy.

3. ETHICAL TRADING STANDARDS

3.1 Employment is Freely Chosen

Employment must be freely chosen. Forced, bonded, compulsory or involuntary labour, slavery, servitude and human trafficking are prohibited. Workers must not be subjected to coercion, threats or deception in connection with their employment and must be free to leave their employment subject to reasonable contractual notice. Workers must not be required to surrender passports, identity documents or other personal documents as a condition of employment.

The Company and its suppliers must comply with applicable modern slavery and human trafficking legislation, including the Modern Slavery Act 2015 where applicable.

3.2 Freedom of Association and Collective Representation

Workers’ rights to freedom of association and collective bargaining will be respected in accordance with applicable law.

Where these rights are restricted by local law, employers should not prevent lawful alternative arrangements for worker representation and communication.

3.3 Working Conditions are Safe and Hygienic

A safe and hygienic working environment must be provided, taking account of the nature of the work and any associated hazards. Appropriate steps must be taken to prevent workplace accidents, injuries and work-related ill health.

Workers must receive appropriate health and safety information, instruction and training relevant to their work. Workers must have access to clean toilet facilities, safe drinking water and appropriate welfare facilities. Responsibility for health and safety must be appropriately assigned within the organisation.

3.4 Child Labour Shall Not Be Used

Child labour must not be used.

No child or young person may be employed in circumstances that are unlawful, exploitative or likely to harm their health, safety, welfare or education. Young workers must not undertake work prohibited by applicable legislation, including hazardous work where relevant.

Applicable legislation and relevant international labour standards concerning child and young workers must be observed.

3.5 Wages and Benefits

Wages and benefits must meet applicable legal requirements.

Workers must receive clear and understandable information about their terms and conditions of employment, including pay, and appropriate information about their wages and deductions. Unlawful or unauthorised deductions from wages are prohibited.

Deductions from wages must only be made where permitted by applicable legislation or otherwise lawfully authorised.

3.6 Working Hours are Not Excessive

Working hours, rest periods and holidays must comply with applicable legislation. Working arrangements should be managed responsibly, taking account of worker welfare, health and safety and operational requirements.

3.7 Equality and Non-Discrimination

Discrimination in recruitment, pay, access to training, promotion, working conditions or termination will not be tolerated. Individuals must be treated fairly and with dignity and respect regardless of any characteristic protected by applicable equality legislation.

3.8 No Harsh or Inhumane Treatment

Physical abuse, threats, intimidation, bullying, sexual harassment, harassment, degrading treatment or other abusive behaviour will not be tolerated. Workers must be treated with dignity and respect.

3.9 Bribery and Corruption

Bribery, corruption, improper inducements or rewards intended to obtain improper business, regulatory or personal advantage are prohibited.

Employees and business partners are expected to comply with applicable anti-bribery and corruption legislation and relevant Company policies, including the Code of Business Conduct.

3.10 Environmental Responsibility

The Company expects its operations and suppliers to comply with applicable environmental legislation and regulatory requirements.

Suppliers and business partners are encouraged to manage their environmental impact responsibly and seek opportunities for continuous improvement.

3.11 Right to Work

The Company will only employ individuals who have the legal right to work in the UK.

Appropriate right-to-work checks will be carried out before employment begins and, where required, during employment, in accordance with current Home Office requirements. Suppliers and labour providers are expected to ensure that workers supplied to the Company have the legal right to undertake the work concerned and that appropriate checks have been completed.

Identity documents must not be improperly retained or withheld from workers.

3.12 Labour Providers

Labour providers must operate in accordance with applicable legislation and regulatory requirements. Where licensing or authorisation is legally required, labour providers must hold and maintain the appropriate licence or authorisation.

Arrangements with labour providers should be appropriately documented. Labour providers may be subject to due diligence, review or audit to ensure appropriate legal and ethical standards are maintained.

Workers supplied through labour providers must be treated fairly and in accordance with applicable employment and labour standards.

4. MODERN SLAVERY AND RESPONSIBLE RECRUITMENT

The Company has zero tolerance for slavery, forced labour, human trafficking and exploitation within its operations and supply chains. Recruitment must be conducted responsibly. Workers must not be subjected to coercion, deception or exploitation in obtaining employment.

Recruitment arrangements must not be used to create debt bondage or otherwise prevent workers from freely leaving employment. Where concerns regarding modern slavery, forced labour, human trafficking or exploitation are identified, they must be reported promptly so that appropriate action can be taken.

5. MONITORING AND DUE DILIGENCE

The Company will communicate its ethical trading expectations to relevant suppliers, labour providers and business partners. The Company may undertake appropriate due diligence and risk assessments to identify and manage ethical trading risks within its operations and supply chains.

Monitoring may include:

- supplier questionnaires and assessments
- review of information held through Sedex
- site visits
- review of labour providers and recruitment practices
- assessment of employment and working practices and
- independent ethical or social compliance audits where appropriate.

The level of monitoring and due diligence undertaken will take account of the nature and level of risk. The Company aims to work collaboratively with suppliers and business partners to support continuous improvement and address identified concerns.

6. REPORTING CONCERNS

Employees, workers, suppliers and other relevant parties are encouraged to raise concerns about suspected breaches of this policy, including concerns relating to modern slavery, exploitation, unsafe working conditions, discrimination, harassment, bribery, corruption or other unethical practices.

Employees and workers may raise concerns with their manager, Human Resources or, where appropriate, through the Company's Whistleblowing arrangements. Suppliers and other business partners should raise concerns with their usual Company contact or Human Resources where appropriate. Concerns raised in good faith will be taken seriously and handled appropriately. Retaliation or victimisation against anyone raising a concern or assisting with an investigation will not be tolerated.

7. NON-COMPLIANCE AND CORRECTIVE ACTION

Where a supplier, labour provider or other business partner does not meet the standards set out in this policy, the Company will consider the nature and seriousness of the non-compliance and the actions required to address it.

Where appropriate, the Company may work with the relevant organisation to agree corrective actions and reasonable timescales for improvement. Depending on the circumstances, action may include:

- a corrective action or improvement plan
- additional monitoring
- training or support
- further audit or assessment
- temporary suspension of supply or services or
- termination of the business relationship.

Serious breaches may require immediate action. The Company reserves the right to suspend or terminate its relationship with suppliers, labour providers or other business partners who commit serious breaches of this policy or fail to take appropriate measures to remedy identified non-compliance.

8. RESPONSIBILITIES

Employees involved in procurement, recruitment, labour provision, supplier management or other relevant activities are expected to support the standards contained within this policy and report concerns where identified.

Managers are responsible for promoting appropriate ethical standards within their areas of responsibility.

Suppliers, labour providers and other relevant business partners are expected to cooperate reasonably with the Company's ethical trading due diligence and monitoring arrangements.

9. POLICY REVIEW

This policy will be reviewed periodically and may be amended to reflect changes in legislation, ethical trading standards, customer requirements or the Company's operations.