SEAFOOD ECOSSE GROUP
CHILD LABOUR PREVENTION AND REMEDIATION 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 Company is committed to ensuring that child labour is not used within its operations or by its suppliers, labour providers or subcontractors. The purpose of this policy is to set out the procedures to be followed where child labour is suspected or identified and to ensure that appropriate action is taken to protect the child concerned.

The Company recognises that child labour can have a serious impact on a child’s health, safety, education and development. Any action taken will therefore consider the child’s welfare and best interests. The Company also recognises the importance of providing appropriate employment and work experience opportunities for young people, subject to relevant legal requirements.

This policy supports the Group Human Rights and Ethical Trading Policies.

This policy does not form part of any employee’s contract of employment and may be amended from time to time.

2. SCOPE

This policy applies across all Group operations and covers employees, temporary and agency workers, young workers, students undertaking work placements, suppliers, labour providers and subcontractors.

All employees and managers are expected to report suspected child labour and cooperate with any investigation.

3. DEFINITIONS

Child	Any person under the age of 18.
Young Worker	A person under the age of 18 who is legally permitted to work, subject to applicable employment and health and safety requirements.
Student Work Placement	A period of work experience or practical learning arranged through a school, college or other educational establishment.
Child Labour	Work undertaken by a child or young person that is prohibited by applicable legislation, interferes with compulsory education or is harmful to their health, safety or development.
Remediation	Action taken to protect and support a child found to be involved in child labour and to prevent the situation from happening again.

The Company recognises that lawful employment of young workers and properly arranged student work placements do not constitute child labour simply because the individuals concerned are under 18.

4. POLICY

The Company will not knowingly employ children below the applicable legal minimum working age or permit young workers to undertake work prohibited by law.

The Company employs young workers from the age of 16 and also provides opportunities for students to undertake work placements. All such arrangements must comply with applicable employment, education and health and safety legislation. Appropriate risk assessments will be carried out before young workers or students commence work or placements, with suitable supervision, training and any necessary restrictions in place.The Company will undertake appropriate checks during recruitment to verify an individual's age and eligibility to undertake the proposed work.

The Company expects its suppliers, labour providers and subcontractors to follow the same principles and comply with applicable legislation.

Where child labour is suspected or identified, the Company will take appropriate action to protect the individual concerned and address the circumstances.

5. REPORTING AND PROCEDURE

Where an employee becomes aware of, or suspects, child labour within the Company or its supply chain, they must report the concern promptly to their line manager or Human Resources.

Concerns may also be raised through the Group Whistleblowing Policy.

On receiving a report:

- The manager must notify Human Resources promptly.
- Human Resources, together with relevant management, will review the information and arrange an appropriate investigation.
- Where there is an immediate risk to the child's safety or welfare, appropriate action must be taken without delay.
- The investigation will establish the individual's age, the nature of the work being undertaken and the circumstances surrounding their employment or placement.
- Where necessary, advice or assistance will be sought from relevant authorities or specialist organisations.
- The findings and recommended actions will be reported to senior management.

Where the concern involves a supplier, labour provider or subcontractor, the relevant management team will be involved in the investigation.

Employees must not attempt to investigate concerns themselves.

6. REMEDIATION

Where child labour is confirmed, the Company will take appropriate steps to ensure that the child is removed from prohibited or unsafe work.

Any action taken must consider the child's safety, welfare, education and personal circumstances.

Depending on the circumstances, remediation may include:

- Ensuring the child is no longer undertaking prohibited or hazardous work.
- Seeking advice or support from appropriate safeguarding authorities or specialist organisations.
- Considering arrangements to support the child's continued education.
- Working with suppliers or labour providers to agree suitable corrective action.
- Considering appropriate practical support where necessary.
- Reviewing recruitment, work placement and employment practices to prevent similar situations arising.

The Company will seek to avoid taking action that could place the child at further risk or unnecessarily worsen their circumstances. Where the matter involves a supplier or labour provider, appropriate corrective action will be expected within agreed timescales. Failure to cooperate or address identified concerns may result in a review or termination of the business relationship, taking account of the child's welfare.

7. RESPONSIBILITIES AND ACCOUNTABILITY

Employees

Employees must report suspected child labour or concerns regarding the safety and welfare of young workers and students undertaking placements.

Managers

Managers must ensure that appropriate arrangements are in place for young workers and students undertaking work placements, including suitable supervision and compliance with any restrictions. They must promptly refer suspected child labour concerns to Human Resources.

Human Resources

Human Resources will coordinate investigations involving the Company's employees or workers, review relevant employment records and advise management on appropriate action. Human Resources will also support the arrangements for employing young workers and accepting student placements.

Health and Safety / Operational Management

Relevant managers are responsible for ensuring that appropriate risk assessments, supervision and workplace controls are in place for young workers and students undertaking placements.

Technical, Compliance and Operational Management

Where concerns involve suppliers, labour providers or subcontractors, the relevant management teams will assist with investigations and corrective action.

Senior Management

Senior Management will review investigation findings and recommendations and approve appropriate remedial action. Urgent action required to protect a child must not be delayed while awaiting approval.

8. MONITORING AND RECORD KEEPING

The Company will maintain appropriate records of concerns raised, investigations undertaken and corrective actions agreed. Relevant records relating to young workers and student placements will be maintained in accordance with applicable legal requirements and Company procedures.

Where remedial action is required, progress will be monitored to ensure that agreed measures have been implemented. Any weaknesses identified in recruitment, work placement arrangements or supplier management practices will be reviewed and addressed as appropriate.

Records will be handled confidentially and in accordance with applicable data protection requirements.

9. COMMUNICATION

This policy will be communicated to relevant employees and managers through appropriate channels, including induction, training and the Employee Support Documents platform.

Managers responsible for young workers and student placements will be made aware of the relevant requirements and safeguards.

Relevant suppliers and labour providers will be made aware of the Company's expectations where appropriate.

10. ADDITIONAL INFORMATION

Concerns regarding child labour may be raised with a line manager, Human Resources or through the Group Whistleblowing Policy. All concerns will be taken seriously and handled appropriately. Employees raising genuine concerns will not be subjected to retaliation or victimisation.