

MODERN SLAVERY STATEMENT

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and sets out the steps taken by Associated Seafoods Limited (ASL) during the financial year 2023/2024 to prevent modern slavery and human trafficking in its business operations and supply chains.

Organisation and Organisational structure

Associated Seafoods Limited (ASL) is a leading Scottish seafood processor and the parent company of Lossie Seafoods Ltd, Moray Seafoods Ltd, and Loch Fyne Oysters Ltd. ASL's operations span multiple sites, including manufacturing facilities in Buckie and Arbroath, a restaurant and deli in Cairndow, an oyster hatchery in Cumbria, and a mussel farm in the Hebrides.

ASL is governed by a Board of Directors and is committed to delivering high-quality, ethically sourced seafood products. Our values are rooted in integrity, responsibility, and respect for people and the environment.

Definitions

Modern slavery is the severe exploitation of someone for commercial gain. It can include:

- human trafficking – where someone facilitates or arranges the transport of another person for exploitation
- forced labour – where someone is forced to work through coercion (threats)
- serfdom – where someone is forced to work through coercion and lives on another's property
- bonded labour – where someone in poverty borrows money and is forced to work to pay off the debt
- descent-based slavery – where slavery is 'passed down' through a family line
- forced and early marriage – where someone is married against their will or is too young to consent to the marriage

ASL maintains a zero-tolerance approach to any form of modern slavery and commits to conducting its business in a fair, transparent, and ethical manner.

Commitment

ASL acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. ASL strictly adheres to the standards required in relation to its responsibilities under relevant employment legislation in the UK, and in many cases exceeds those standards in relation to its employees.

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

Roles and Responsibilities

It is the overall responsibility of the Chief Executive Officer for ensuring that this policy complies with the Company's legal and ethical obligations. Other responsibilities may be delegated to individuals, or groups of individuals, on behalf of the Chief Executive Officer. Group Head of HR is responsible for the implementation of this policy, as well as monitoring its use and effectiveness. CSR Manager is responsible for ensuring adequate due diligence is undertaken within ASL's supply chain.

Organisational policies

ASL has implemented policies and procedures that reinforce our stance against modern slavery, including:

- Human rights policy
- Whistleblowing policy
- Ethical standards policy
- Equal opportunities policy
- Remediation policy
- Supplier code of conduct
- Bullying and harassment policy
- Corporate social responsibility policy
- Dignity at work policy
- Responsible seafood sourcing policy

All policies are reviewed on a regular basis and updated in line with evolving legislation, ethical standards and best practice.

Supply Chains

Our key supply chains include:

- Fish and shellfish (UK and international)
- Packaging, ingredients, and raw materials
- Equipment, facilities services, and logistics

We recognise that certain sectors of our international supply chain may present higher risks due to localised labour standards and regulations. We assess these risks regularly using external benchmarks, sectoral risk tools, and ethical audit data. Suppliers are subject to a thorough approval process prior to supply commencing.

Assessing and managing risk

At ASL, we recognise that while our direct exposure to modern slavery and human trafficking risks may be relatively limited, we are committed to taking these issues seriously across all aspects of our operations. We have implemented proactive measures to prevent such practices within our business and throughout our supply chain. We adopt a continuous improvement approach—regularly reviewing and strengthening our processes to identify and address any potential risks. We are committed to staying vigilant and will not be complacent in our efforts to uphold ethical standards and human rights across our operations and partnerships.

ASL applies the following controls across its operations and supply chains:

- **Supplier Code of Conduct:** All suppliers must commit to prohibiting forced labour and exploitation. All suppliers are required to sign and agree with ASL's Supplier Code of Conduct. We reserve the right to terminate supplier relationships where breaches are identified and not promptly remediated.
- **SEDEX Membership and SMETA Audits:** Used to monitor ethical standards. Suppliers not on SEDEX must complete internal form, and provide a written statement to confirm that they do NOT have any form of Modern Slavery.
- **Labour Provider Audits:** Conducted regularly; our providers are GLAA licensed.
- **Recruitment Safeguards:** Right-to-work checks and Stronger Together standards embedded into hiring.
- **Risk-Based Auditing:** Suppliers assessed on geography, product type, and operational complexity.

Due diligence in relation to modern slavery

ASL carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

ASL has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

ASL has taken the following steps to cease and prevent modern slavery and mitigate the risk of Modern Slavery within its operations and supply chains:

- Conducted full training gap analysis and put training action plan in place. Key members of staff have undergone Stronger Together Tackling Modern Slavery training, including an advanced level.
- As part of induction, all members of staff receive modern slavery training.
 - In addition, induction training includes Human Rights, the Ethical Trading Initiatives (ETI) base code, ASL's equal opportunities policy, grievance procedure, and whistleblowing policy.
- Posters are displayed throughout all sites, in various languages.
- Recruitment process have been reviewed to ensure prospective employees are not victims of Modern Slavery.
- ASL were awarded Responsible Recruitment Business Partner in 2024 and Stronger Together Business Partner in 2024 and 2025.
- We work in a partnership with our Labour providers, who are Gangmasters & Labour Abuse Authority (GLAA) licenced. Regular labour providers audits include workers welfare interviews.

- ASL have conducted a Human Rights Risk Assessment with subsequent action plan created to further mitigate risks.
- ASL have implemented appropriate policies and procedures, covering areas such as: Human Rights, Whistleblowing, Grievance, Ethical standards, and Remediation. These are reviewed on a regular basis.
- ASL have established a cross-departmental Human Right Due Diligence Committee to drive Human Rights priorities, encourage collaboration across the business and achieve our short-, medium-, and long-term Human Rights objectives.
- Our Terms & Conditions include termination clauses in the event a supplier is, or is suspected, to be involved in modern slavery practices.
- ASL has measures in place to identify and assess the potential risks in its supply chains.
- ASL has strengthened its partnership with SAMS, of which we are a member.

Training and Awareness

All ASL employees receive training on:

- Recognising signs of modern slavery
- Reporting concerns internally or externally
- Ethical Trading Initiative (ETI) Base Code
- ASL's grievance and whistleblowing channels

Targeted, more comprehensive training is also delivered to key members of staff within different functions (HR, Technical, CSR, Procurement, Operations)

Monitoring and evaluation

ASL uses the following **Key Performance Indicators (KPIs)** to evaluate the effectiveness of our approach:

- Regular labour provider audits and worker welfare interviews
- Modern slavery and ETI training completion: 100%
- Analysis of grievances and whistleblower reports
- Staff survey results
- Ongoing SMETA ethical audits
- 100% completion of right-to-work checks

Commitments

ASL are committed to the continuous improvement of its processes. The below outlines some key commitments/objectives for the next 12 months:

- ASL will work diligently to ensure the organisation is compliant with all necessary legislative requirements regarding Human Rights and the due diligence of relevant issues.
- We will strive to become a Stronger Together Business Partner next year.
- We will undertake an annual review of training and guidance relating to Human Rights Due Diligence, making use of tools available to the business to assist with the continuous development and improvement of our operation processes.

- We will develop and strengthen engagement between ASL and key industry stakeholders such as the Food Network for Ethical Trade (FNET) and the Sea Ethics Action Alliance (SEAA) and work closely with these and other organisations on Horizon scanning, information sharing and developing best practice.
- ASL will continue to develop and improve collaboration and transparency efforts across its supply chain.
- ASL will annually review its Modern Slavery Statement and make this publicly available.
- ASL will continue to regularly assess supply chain for the relevant human rights risks.

Raising Concerns

Employees are encouraged to talk to a member of HR team if they have a question about modern slavery, or if they are not sure something they have seen counts as modern slavery.

All employees and stakeholders are encouraged to report any suspicions or incidents of modern slavery. Reports can be made to a member of HR team or anonymously through our whistleblowing system. The Modern Slavery Helpline (08000 121 700) is also available for independent support.

No individual will face retaliation for raising concerns in good faith.

Conclusion

ASL is committed to the prevention of modern slavery in all forms. We believe in acting responsibly, transparently, and collaboratively to uphold the rights of all individuals connected to our business and supply chains.

This statement is made in pursuance of s.54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Signed: Victor West, CEO: May 2025

