



Thistle Seafoods Ltd
Modern Slavery Statement 2020

Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Thistle Seafoods has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Thistle Seafoods 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 against any form of modern slavery taking place within the business or our supply chain.

Our Business

Thistle Seafoods is a highly innovative, private label manufacturer of chilled and frozen coated and added value seafood and non-seafood products. Our 75,000sq ft. factory has seven production lines with advanced portioning, pressure forming and shaping technology as well as a bulk sauce plant and packing line. We employ more than 450 people at our 5.5 acre site, which also has an in-house micro-laboratory that has been approved by Campden BRI Food Research Association. All of the facilities are accredited to the highest BRC Grade A standards and there are extensive New Product Development (NPD), Quality Assurance (QA), laboratory and cold-storage facilities on site. We currently supply major retailers and food service companies in the UK, as well as Europe, Canada, North America and Australia.

Our High-Risk Areas

The areas we believe that are at the highest risk for modern slavery occurring is within our raw material supply chain. We have approximately 45 tier one suppliers of raw material, which are located across a number of different countries. We recognise that our supply chains are complex and go beyond tier one. For example, with regards to fish, the supply chain is long with multiple tiers, which go as far back as the fishing boats. The raw material can move through multiple areas and factories before arriving at Thistle Seafoods, which makes the supply chain complex and difficult to manage.

As a starting point, and in order to mitigate the risk in this area, we audit the tier one factories and ensure that they adhere to the correct standards. This includes providing them with our Social Compliance and Ethical Policy and asking them to sign an acknowledgment confirming that they understand it and will work to the standards identified. We also encourage them to train their staff to be aware of the signs of modern slavery and how to report it.

Our Policies and Practices

Thistle Seafoods is a registered AB member of Sedex. Sedex is an online platform that allows companies to share and manage supply chain information regarding labour standards, health and safety, the environment and business ethics. This platform allows us to view and run reports on our suppliers' ethical data, manage information regarding our own facilities, and share information with our customers. We are currently linked to all tier one suppliers and customers.

We are also a member of the Responsible Recruitment Toolkit (RRT). The RRT is a tool that supports businesses embed responsible recruitment practices in their supply chains. It maps relevant global social compliance codes, which define 27 responsible recruitment labour standards, which cover all stages and elements of labour sourcing and supply. Although in its infancy this toolkit will help tackle modern slavery, eliminate illegal and unfair recruitment fees and ensure the ETI base code is adhered to throughout global supply chains. It is Thistle Seafoods aim to make significant progress submitting relevant information to the toolkit regarding responsible recruitment standards and social compliance standards when possible.

In addition, we operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These policies are reviewed and updated on an annual basis. They include:

Social Compliance and Ethical Policy

As previously noted, this policy sets out the specific standards the organisation expects its suppliers to meet in relation to human rights, environmental impacts and ethical business practices. It also outlines that the organisations employees and directors must carry out their business and perform their duties to the highest ethical standards and in compliance with all relevant legal principle. This includes when dealing with employees, customers, suppliers, and all other stakeholders.

Recruitment Policy

We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees, to safeguard against human trafficking or individuals being forced to work against their will.

Any employment agency that supplies temporary labour to us are subject to at least an annual labour agency provider audit. These audits ensure the following:

- They hold the required Gangmaster and Labour Abuse Authority Licence.
- They are members of the Association of Labour Providers (ALP) and are aware of and are operating to the standards of the Stronger Together Initiative.
- There is a Service Level Agreement and Contract in place between both parties.
- They hold the relevant documents on the personnel they employ i.e. right to work in the UK, contract of employment, training records, literacy information, food handler's agreement, etc.
- They adhere to working regulations and pay legislation.
- They demonstrate commitment to, and application of, the requirements of the ETI base code.

Whistleblowing Policy

We are committed to upholding the highest standards of conduct and ethics in all areas of the organisation. In line with this commitment, we have appointed an external and independent whistleblowing service called SeeHearSpeakUp. If any member of staff has a serious concern about any aspect of the organisation's work, how colleagues are being treated, or practices within our business or supply chain, they are encouraged to come forward and voice those concerns in a safe and secure manner. All concerns are taken seriously and investigated appropriately.

Equal Opportunities Policy

We are committed to promoting equal opportunities in employment. All employees and job applicants receive equal treatment regardless of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation ('Protected Characteristics'). This policy applies to all aspects of employment with us, including recruitment, pay and conditions, training, appraisals, promotion, conduct at work, disciplinary and grievance procedures, and termination of employment. All managers are responsible for ensuring all employees receive the same treatment and opportunities irrespective of their Protected Characteristics. All staff are responsible for not discriminating against their colleagues, customers or suppliers during the course of their employment.

Grievance Policy and Procedure

A grievance procedure is in place for any member of staff who would like to raise any problems encountered through this official process. All grievances are taken seriously and investigated appropriately.

Bribery Policy

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. This policy applies 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.

Our Suppliers

Thistle Seafoods operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that a particular organisation has never been convicted of offenses relating to modern slavery, site audits which include a review of working conditions and the completion of a self-assessment questionnaire (SAQ) that has sections specifically asking about modern slavery and child labour. Our Social Compliance and Ethical Policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have started to take steps to eradicate modern slavery within their business.
2. If modern slavery is found in their own supply chain, they will take the appropriate action.

3. They accept that may terminate the contract at any time should any instances of modern slavery come to light.

Training

Representatives from our human resources, technical and buying teams attend training events, workshops and roadshows on a regular basis to ensure the knowledge we have regarding Modern Slavery, and how to identify it and tackle it, is current. We ensure that key members of staff who undertake audits of supplier sites have a good understand of modern slavery, can identify the signs of it and are aware of the process to follow if they suspect that it is taking place within our supply chain. In addition, we include information regarding modern slavery within our induction. This includes showing a Stronger Together approved video regarding modern slavery, highlighting what the signs of modern slavery are and how it can be reported. All members of staff must attend the induction prior to commencing work with us. We also have the Stronger Together posters displayed in multiple languages within the staff canteen, to remind staff of the signs of Modern Slavery and how it can be reported.

Our Progress 2020

The Modern Slavery Team, which convened in 2019 and is comprised of representatives from all departments, was scheduled to meet every three months but the Covid-19 pandemic precluded physical meetings for most of the year. However, social and ethical issues remained at the forefront and were tracked, and where required actions were taken by Human Resources. The team maintained dialogue to identify key tasks to complete and to evaluate progress. Key tasks we have identified and the progress we have made are as follows:

Training – We continued to educate new employees about modern slavery through the induction. As previously noted, our next steps were to identify how we can roll out more in-depth training to employees. Unfortunately, this was not met due to all non-essential training being suspended due to the Coronavirus pandemic.

Assessment of Suppliers – We continued to issue every supplier with our new self-assessment questionnaire (SAQ). We also continued to review the information provided in order to assess their suitability regarding whether they could continue to be, or become, an approved supplier.

Geographic Location of Suppliers – We continued to review the full list of ingredients we use onsite, and we established their origins. We created an initial sourcing map, and using the Stronger Together information, we determined which countries are high risk and identified any ingredients from these locations.

Tier One Suppliers – We continued our high-level audit of our suppliers. We established whether they are legally required to publish a Modern Slavery Statement (by checking if they carry out their business, or part of their business, in the UK, and if they have an annual turnover of £36 million or more). For eligible companies, we verified that they had published a Modern Slavery Statement.

Key Performance Indicators

In order to assess the effectiveness of the measures we apply the following key performance indicators (KPI's), comparing our previous financial year results with the current financial year results.

- Number of staff who have completed the modern slavery awareness session delivered at induction. Our aim is 100%
- Number of suppliers who have completed our new supplier SAQ. Our aim is 100%
- Number of ingredients whose origins have been identified and mapped.
- Number of supplier modern slavery statements that have been audited. Our aim is 100%

We will also know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or tier one supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- No internal and/or external audits identify modern slavery practices are taking place.

2021 Future Plans

Corporate Social Responsibility (CSR) Department

In 2021, Thistle Seafoods will convene a dedicated internal Corporate Social Responsibility (CSR) Department to further develop and coordinate the company's environmental, social, and ethical policies and practices. We will replace the Modern Slavery Committee with a cross-functional CSR Ethical Working Group. The CSR Department will engage with national bodies and relevant trade groups regarding tracking and aligning with Modern Slavery Best Practices (e.g., SEA Alliance). We also plan to sign up as a collaborating partner with Scotland Against Modern Slavery (SAMS), and CSR staff will complete training modules provided by Stronger Together.

CSR Ethical Working Group

An internal CSR Ethical Working Group will be convened, composed of representatives from functional/operational units. The working group will identify ethical concerns at factory, supply chain and primary production (wild and aquaculture) level. The group will also be tasked with continually reviewing the company's Social Compliance and Ethical Policy.

Modern Slavery Statement / Supply Chain Mapping

Using the high-level audit referenced above, the CSR Department will conduct a more in-depth review of our supplier base to ensure the presence of public statements on, and adherence to, acceptable policy/position regarding Modern Slavery and Human Trafficking. This includes compliance with recognised standards and audits. The CSR Department will develop a tracking process and scoring system for our supply chain. The criteria applied will include whether individual production sites hold a suitable internationally recognised accreditation. The results, available at individual customer and aggregate levels, will be RAG rated. This will contribute towards the Thistle Seafoods KPI with regards to ensuring the elimination of Modern Slavery within our supply chain.

Coronavirus (COVID-19)

Please note that there has been a delay in publishing our 2020 Modern Slavery Statement due to the Coronavirus Pandemic. Although we continued to address Modern Slavery throughout 2020 using the aforementioned methods, the HR Director who is responsible for compiling this report was unable to do so within the recommended timeframe i.e., within six-months of the end of the financial year (31st December 2020). This was due to the HR Director playing a key role in mitigating the risk of the coronavirus on site and implementing all the necessary policies and procedures.

Approval for this Statement

This statement was approved by the Board of Directors on 20th August 2021.

A handwritten signature in black ink, appearing to read 'P Macdougall', with a stylized initial 'P'.

Pamela Macdougall

20th August 2021