Thistle Seafoods Ltd

Modern Slavery Statement 2021

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.

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 private label manufacturer of chilled and frozen coated and added value seafood and non-seafood products. We employ more than 450 people at our 5.5-acre site and all the facilities are accredited to the highest BRC Grade A standards. 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 and ingredient supply chain. We have approximately 95 tier one suppliers of raw material and ingredients which are located across several different counties. 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.

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 includes an online search to ensure that a particular organisation has never been convicted of offenses relating to modern slavery. To mitigate the risk further, we RAG rate our suppliers based on information from their self-assessment questionnaire (SAQ). The questionnaire contains sections specifically asking about modern slavery and child labour and must be completed and submitted prior to supply. From this we audit high risk 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. 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. In addition, we operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These polices are reviewed and updated on an annual basis. They include:

Social Compliance and Ethical Policy

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 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 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.

Training

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. Representatives from the Ethical working group including Technical, Buying, HR and CSR have completed Stronger Together modern slavery training.

Key Performance Indicators

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.

Key Performance Indicator	FY 2020	FY 2021
% of staff that have completed the modern slavery awareness session at induction.	100	100
Number of modern slavery cases identified on site.	0	0
Number of modern slavery cases identified in our supply chain.	0	0
% of new suppliers that have completed our onboarding SAQ.	100	100
% of eligible raw material suppliers with a modern slavery statement on the UK register.	n/a	57
% of eligible ingredient suppliers with a modern slavery statement on the UK register.	n/a	60
% of tier 1 suppliers of raw material & ingredients linked on SEDEX.	35	63
% of raw material suppliers reaching 3/5 status or better using Thistle's internal scoring system.	n/a	32
% of ingredient suppliers reaching 3/5 status or better using Thistle's internal scoring system.	n/a	52

Our Progress 2021

CSR Unit

Thistle Seafoods convened a dedicated internal Corporate Social Responsibility (CSR) Unit to further develop and coordinate Thistle's Social and Ethical policies and practices.

Modern Slavery Outreach

The CSR Unit has engaged with national bodies and relevant trade groups to track and align with Modern Slavery best practices (e.g., Seafish & MSC). We have signed up as a collaborating partner with Scotland Against Modern Slavery (SAMS), and CSR staff have completed relevant training modules provided by Stronger Together.

Supply Chain Mapping

We conducted an in-depth review of our supplier base to ensure the presence of public modern slavery statements. The CSR Unit has developed a tracking process and scoring system for our supply chain. The criteria applied includes Modern Slavery Statement on website if applicable, Tier 1 suppliers linked on SEDEX, and GFSI accreditation. The results are ranked 1-5, are monitored monthly and form part of Thistle's Modern Slavery KPI's.

CSR Ethical Working Group

An internal CSR Ethical Working Group has been convened (meets 3-4 times per year) and is composed of representatives from functional / operational units. The working group continues to identify ethical concerns at factory, supply chain and primary production level. The group is also tasked with continually reviewing Thistle's Social Compliance and Ethical Policy.

Future Plans 2022

Raw Material Sourcing

Our aim is to sign up to the Human Rights Risk Indicator (HRRI) via Sustainable Fisheries Partnership (SFP) metrics. We plan to integrate the SFP HRRI ethical index into the sourcing of our raw material.

KPI's

Our aim is to improve our KPI scores mentioned above. We also plan to include the following KPI's:

- % of staff who have completed modern slavery annual refresher training.
- % of factory managers/supervisors trained in modern slavery awareness.
- % of tier 1 suppliers of raw material SMETA audited.

Supply Chain Mapping

We aim to complete an in-depth review of our packaging, engineering, and logistics suppliers to ensure the presence of public modern slavery statements. We aim to extend our supply chain mapping tracking and scoring system to these sectors.

Approval for this Statement

This statement was approved by the Board of Directors on the 16th June 2022.



Pamela Macdougall

16th June 2022