BIOMAR - MODERN SLAVERY STATEMENT

Financial Year 2023

Respecting and promoting human rights is essential for living our purpose in BioMar. We are committed to upholding human rights and comply with universal human rights principles as stated in United Nations Universal Declaration of Human Rights, the United Nations Rights of the Child, the Conventions of the International Labour Organisation (ILO), the Ethical Trading Initiative, and the Conventions of the World Health Organisation, and we require our suppliers to do likewise, at the same time making all employees aware of their labour-related rights. All human beings should be met and treated with dignity and respect.

BioMar is committed to making every effort to eradicate modern slavery and human trafficking from our business and supply chain. Modern slavery and human trafficking are of growing concern in both the UK and globally and BioMar Ltd. recognises that we are on a journey to improve our due diligence processes in our business and supply chain both in the UK and as part of BioMar Group. We are actively working on developing methods to monitor effectiveness in this area, targeting measured continuous improvement.

Our Business

BioMar is fully owned by Danish conglomerate Schouw & Co. Founded in 1878, Schouw & Co. is listed on Copenhagen Stock Exchange and makes long-term investments in leading businesses. It's subsidiary portfolio businesses employ more than 4,500 employees worldwide. BioMar is the largest investment in Schouw & Co. representing more than half of the turnover of the group.

BioMar Group is a world leader in the production of high performance diets for more than 45 different fish and shrimp species in more than 80 countries. Founded in 1962 by a group of Danish fish farmers, BioMar's heritage is a long-term commitment to developing the aquaculture industry in a responsible and sustainable way.

Our focus is supporting our customers delivering healthy, great tasting seafood. We do this by innovating efficient, safe and nutritious feed for aquaculture with minimal environmental impact. Our global scale, local agility and execution focus ensure that we can meet individual customer needs.

BioMar UK, based in Grangemouth, Scotland, was established in 1995 and works to the highest industry standards recognised through the achievement and retention of the following quality standards

- Universal Feed Assurance Scheme (AIC, UFAS)
- Marks and Spencer Feed Manufacture Scheme
- HALAL Assurance Scheme
- Coop Italia
- ISO 9001 – Quality
- ISO 14001 – Environmental

- ISO 45001 – Occupational Health & Safety
- ISO 22000 – Feed Safety
- Label Rouge Certified
    - 33-90 Scottish Fresh,
- BAP Certified
- Can produce ASC compliant feed for customers growing ASC compliant fish
- Organic Certified
    - Naturland Organic
    - Organic Food Federation
- Veterinary Medical Directorate

Our Supply Chains

Our supply chains include the sourcing of raw materials from the UK and globally and therefore we recognise that there are countries and companies that are at a higher risk of modern slavery and trafficking than others, particularly, but not exclusively, in the production and transportation of raw materials. BioMar Group is working towards attaining the Aquaculture Stewardship Council (ASC) standard which will significantly enhance our due diligence on modern slavery and trafficking under the ASC principles.

Currently ASC compliant fish are produced by our customers through an ASC farming standard. This has been replaced with a feed mill standard which became effective September 2022 after which plants can be audited. BioMar's Group's Purchasing Team has re written the Global Supplier Code of Conduct with ASC in mind. For ASC the Purchasing Team are also going one stage further and Code of Conducts will be sent to ingredient manufacturers who supply our suppliers. This covers modern slavery and trafficking extensively and will be reviewed again at the end of 2024.

BioMar UK specialises in the provision of high-performance diets for salmon and trout. Distribution of finished feed is primarily to the Scottish Salmon producing market with 82% and the remaining 18% currently exported to Canada, Ireland, and Norway.

Our current UK Supplier due diligence process involves the completion of a supplier approval process comprising our current code of conduct and supplier approval questionnaire which suppliers need to sign and return as acceptance that their business practices are aligned to BioMar standards. Suppliers are also asked to provide their own Statements on modern day slavery, Code of Conduct and sustainability and environmental information. Depending on the questionnaire response from suppliers, and an associated risk assessment, a physical audit might be performed.

BioMar has zero tolerance to slavery and human trafficking and are working towards ensuring that everyone in our supply chain complies with this. A supplier who fails to provide us with the appropriate information in a timely manner may no longer be able to supply BioMar.

In the UK we follow the ETI base code as our guiding principle for our own employees and this is detailed below.

(1) Freedom of Employment

- Organisations shall not use any form of slave, forced, bonded, indentured, or any prison labour, nor shall they be engaged in exploitation or human trafficking, or import goods tainted by slavery or human trafficking.
- All personnel shall have the freedom to accept or leave a job voluntarily.
- Workers are not required to lodge "deposits" or their identity papers with their employer and are free to leave their employment after reasonable notice.
- The organisation shall have management systems that ensure Employment is freely chosen that includes each of the following elements. - written policies & procedures, communication & training, monitoring & governance.

(2) Freedom of Association & The Right to Collective Bargaining

- Organisations are required to respect the rights of workers to associate or not to associate with any group, as permitted by law.
- All personnel shall have the right to associate or not associate with any group of their choice, as permitted by law without fear of reprisal, intimidation, or harassment.
- All personnel shall have the right to form, join and organise trade unions of their choice to bargain collectively on their behalf with the organisation.
- In situations where the right to freedom of association and collective bargaining are restricted under law, the organisation shall allow workers to elect their own representatives freely.
- The organisation shall ensure that union members, representatives of workers and any personnel engaged in organising workers are not subjected to discrimination, harassment, intimidation or retaliation for being union members, the representative(s) of workers or involved in organising workers and that such representatives have access to their members in the workplace.
- The organisation shall have a freedom of association and the right to collective bargaining management system that includes each of the following elements. - written policies & procedures, communication & training, monitoring & governance.

(3) Working Conditions

- The organisation shall provide a safe and hygienic workplace environment bearing in mind the prevailing knowledge of the industry and of any specific hazards.
- The organisation shall appoint a senior management representative to be responsible for ensuring a safe and healthy work environment for all personnel and for implementing this Standard's Health & Safety requirements.
- The organisation shall provide and shall take adequate steps to prevent potential health & safety incidents and occupational injury, or illness arising out of, associated with or occurring in the course of work. It shall minimise or eliminate, so far as is reasonably practicable, the causes of all hazards in the workplace environment.
- The organisation shall provide personnel with appropriate personal protective equipment as needed when hazards remain after adequate minimisation or elimination of the causes of all hazards in the workplace environment and the organisation.
- The organisation shall assess all the workplace risks to new, expectant and nursing mothers including those arising out of their work activity, to ensure that all reasonable steps are taken to remove or reduce any risks to their health & safety.
- In the event of a work-related injury, the organisation shall ensure that adequate employees are trained to provide first aid.

- The organisation shall ensure that all personnel receive regular and recorded health & safety training, and such training shall be repeated for new or reassigned workers.
- The organisation shall provide, for use by all personnel, free access to clean toilet facilities, potable water, suitable spaces for meal breaks, and, where applicable, sanitary facilities for food storage.
- All personnel shall have the right to remove themselves from imminent danger without seeking permission from the organisation.

(4) Child & Young Workers

The organisation shall not engage in or support the use of child labour as defined below.

- Underage labour is any person under the minimum employment age according to the laws of the facility's country, or, in the absence of regulation, under the minimum age for completing required education. If the country's minimum working age is either not defined or younger than 15, suppliers, facilities and subcontractors within their supply chain shall not employ anyone younger than 15. Underage labour is not to be used to produce or distribute goods or services. Underage labour laws protect children and benefit communities.
- The organisation shall develop, document, maintain and effectively communicate to personnel and other interested parties, written policies and procedures for remediation of child labourers, and shall provide adequate financial and other support to enable such children to attend and remain in school until no longer a child as defined above.
- The organisation may employ young workers, but where such young workers are subject to compulsory education laws, they shall work only outside of school hours.
- The organisation shall ensure that under no circumstances shall any young worker's school, work and transportation time exceed a combined total of 10 hours per day, and in no case shall young workers work more than 8 hours a day.
- Young workers may not work during night hours.
- The organisation shall not expose children or young workers to any situations, in or outside of the workplace, that is hazardous or unsafe to their physical and mental health and development.
- The organisation shall have a child & young worker management system that includes each of the following elements. - written policies & procedures, communication & training, monitoring & governance.
- Definitions: Child means any person less than 15 years of age. If local minimum age law stipulates a higher age for work or mandatory schooling, the higher age applies. Young Person means any worker over the age of a Child (as defined above) and under the age of 18. Child Labour means any work by a Child or Young Person younger than the age specified in the above definitions, which does not comply with the provisions of the relevant ILO standards, and any work that is likely to be hazardous or to interfere with the Child's or Young Person's education, or to be harmful to the Child's or Young Person's health or physical, mental, spiritual, moral or social development.

(5) Wages and Benefits

- The organisation shall ensure that personnel are compensated according to the law including minimum wage, overtime and premium pay.
- The organisation shall ensure that personnel receive equal pay for equal work without discrimination.

- The organisation shall ensure that no deductions are taken from the employees pay as part of any disciplinary action.
- The organisation shall ensure that personnel's wages and benefits composition are detailed clearly and regularly to them in writing for each pay period.
- The organisation shall lawfully render all wages and benefits due in a manner convenient to workers, but in no circumstances in delayed or restricted forms, such as vouchers, coupons or promissory notes.
- The organisation shall have a wages management system that includes each of the following elements. - written policies & procedures, communication & training, monitoring & governance.

(6) Working Hours

- The organisation shall comply with applicable laws, collective bargaining agreements (where applicable) and industry standards on working hours, breaks and public holidays. The regular work week, not including overtime, shall be defined by law but shall not exceed 48 hours.
- The organisation shall ensure working hours, excluding overtime, is defined by the contract, and shall not exceed 48 hours per week.
- The organisation shall ensure Workers do not work over 12 hours per day, where allowed by local law.
- The organisation shall ensure all overtime is voluntary and that overtime shall be used responsibly, taking into account all the extent, frequency and hours worked by individual workers and the workforce as a whole.
- The organisation shall ensure that the total hours worked in any 7 days shall not exceed 60 hours.
- The organisation shall ensure workers shall be provided with at least one day off in every 7 days or, where allowed by national law, 2 days off in every 14 days
- The organisation shall have a working hours management system that includes each of the following elements. - written policies & procedures, communication & training, monitoring & governance.

(7) No Discrimination

- The organisation shall ensure that the environment provided is free from discrimination.
- The organisation shall not discriminate in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.
- The organisation shall not interfere with the exercise of personnel's rights to observe tenets or practices or to meet needs relating to race, national or social origin, religion, disability, gender, sexual orientation, family responsibilities, union membership, political opinions or any other condition that could give rise to discrimination.
- The organisation shall not subject personnel to pregnancy or virginity tests under any circumstances.
- The organisation shall have a "No Discrimination" management system that includes each of the following elements. - written policies & procedures, communication & training, monitoring & governance.

(8) Regular Employment

- The organisation shall only employ workers who are legally authorised to work in their location and facility and have a process for validating employees' eligibility to work status through appropriate documentation.
- The organisation shall ensure that all work performed is on the basis of a recognised employment relationship established through national law and practice.

(9) No Harsh or Inhumane Treatment

- Any physical, verbal or threatening abuse, harassment in any form, including intimidation and unethical disciplinary actions, shall be prohibited.
- The organisation shall establish a written grievance procedure that is confidential, unbiased, non-retaliatory and accessible and available to personnel and interested parties to make comments, recommendations, reports or complaints concerning the workplace
- The organisation shall have procedures for investigating, following up on and communicating the outcome of complaints concerning the workplace and/or non-conformances to this standard or of its implementing policies and procedures. These results shall be freely available to all personnel and, upon request, to interested parties.
- The organisation shall not discipline, dismiss or otherwise discriminate against any personnel or the interested party for providing information on compliance or for making other workplace complaints.

(10) Environmental

- The organisation shall comply with the requirements of local and international laws and regulations including having necessary permits.
- The organisation shall as a minimum meet the requirements of local and national laws related to environmental standards.
- The organisation shall, where it is a legal requirement, be able to demonstrate that they have the relevant valid permits for the use and disposal of resources, e.g., water, waste and air emissions etc.
- The organisation shall have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its suppliers.
- The organisation shall be aware of the significant environmental impact of its site(s) and its processes.

(11) Workers Accommodation

- The organisation shall ensure that dormitories or other housing that is provided, have sufficient living space that meets all emergency safety standards and applicable laws.
- The organisation shall ensure accommodation/ dormitories or other housing provided (such as single dwelling homes, or apartments) includes the same standard of living for all residents.
- The organisation shall ensure that the physical and structural integrity of living quarters are assessed by experts to guarantee that they are capable of and suitable for housing people.
- The organisation shall ensure that the Living quarters should afford a minimum of approximately 20 square feet (1.8 square meters) per person, which includes a sleeping area and available floor space. Everyone should be provided with a secure storage of at least one cubic foot (0.3 cubic meters).

(12) Workforce, Subcontractors Agencies & Migrant Labour

- There should be no sub-contracting unless previously agreed with the clients you work with.
- Any Employment Agencies or Subcontractors used must have the legal right to operate and only supply workers registered with them.
- All Employment Agencies and subcontracted suppliers must meet the same criteria as directly contracted product and service suppliers.
- The organisation shall ensure that third-party agencies, recruitment firms, labour brokers and subcontractors comply with legal employment practices. All standards also apply to temporary workers as well as regular workers.
- The organisation shall ensure a full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal requirements.
- The organisation shall have an effective management system in place to identify and monitor the hiring and management of all migrant workers, contract workers, agency workers, temporary or casual labour.
- The organisation shall implement processes to enable adequate control over agencies with regards to the above points and related legislation.
- The organisation shall ensure that Employment agencies only supply workers registered with them.
- The organisation shall ensure workers do not pay any recruitment fees at any stage of the recruitment process.
- Our Employee Handbook: equal opportunities, diversity, non-harassment, disciplinary, whistleblowing and anti bribery policies supports these aims. All new starters receive the handbook as part of their on-boarding programme.

Responsibilities and Training

The Human Resources Director has day-to-day responsibility for anti-slavery and human trafficking compliance within the business and has the responsibility for developing and operating company procedures relevant to this issue.

The BioMar Management Team is responsible for compliance in their respective departments and for their supplier relationships. Training on modern slavery and trafficking has been rolled out since Q4 2021 and every new employee is given this to complete since. to the Management Team and all key employees. The training involves a test of competence and understanding.

From January 2022 all new starts as part of their on-boarding programme will receive information and induction in our policies and procedures in relation to modern slavery and trafficking and equality and diversity as well as a requirement to undertake training and formal assessment. In addition, new employees will receive information on how to raise concerns both informally and formally in BioMar UK including via our anonymous Whistleblowing Line.

In 2023, BioMar is focusing on becoming SMETA and ASC accredited which will involve the training of employees on compliance in regard to working hours, modern slavery and equality, diversity and inclusion.

Measuring Improvements and KPI's

BioMar is aware that we need to continue to build on the work we are doing in this area. BioMar Group and BioMar UK are working together to ensure a comprehensive approach across our organisation.

We are continuing to develop our KPI's in this area and will measure the following for 2023 to understand how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- There is an updated supplier code of conduct published on the group BioMar website and this is being developed further with ASC in mind.
- All Key Staff including all Senior Management have been trained in the Modern Slavery Act and Equality and Diversity via our eLearning platform.
- Modern Slavery and Equality and Diversity training will be part of our on-boarding programme from January 2022, and this continues going forward.
- Payroll and HR practices are audited once a year to ensure compliance and for improvement.
- Following publication of ASC standards, a full gap analysis will be completed June 2023 and BioMar UK aim to achieve ASC certification in 2024.
- All complaints of modern slavery or human trafficking reported internally or through the confidential whistle blowing line will be responded to within 24 hours.
- Suppliers are approved annually
- Our Code of Conduct and websites will be reviewed during 2023 to ensure relevance and effectiveness of our increasing focus on modern slavery and trafficking

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes an update to our slavery and human trafficking statement for the financial year ending 2023.

Robert Wilson

Business Unit Director

Signed 

Date 04/11/2024