



Thistle Seafoods Ltd
Modern Slavery Statement 2018

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, 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 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.

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 have also recently become 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 throughout 2019.

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 and site audits which include a review of working conditions. 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. Members of staff who had commenced employment with us prior to this being included in the induction have subsequently received an awareness session regarding it.

Our Progress and Future Plans

We have formed a Modern Slavery Team, which comprises of representatives from all departments. The team meets every two months to identify key tasks to complete and to evaluate our progress. Key tasks we have identified to complete within this next year are as follows:

Training – Roll out more in-depth training to employees. We will initially focus on the employees who work more closely with potential victims of modern slavery i.e. staff who work in the production, human resources, technical and buying departments.

Assessment of Suppliers – we will complete a questionnaire on each of our suppliers to determine their risk profile regarding modern slavery.

Geographic Location – we will map all of our suppliers and apply a risk level to specific counties in our supply chain such as China, Thailand, Vietnam and Brazil.

Tier One Suppliers – where applicable we will audit our tier one suppliers Modern Slavery Statement. Where this is not applicable, we will ask them to provide us with evidence of the work they have completed with regards to Modern Slavery within their business and their supply chain.

With regards to our suppliers, once the assessment and geographic location tasks are complete, we will identify our next steps. The action we take will be determined by the risk rating combined with the influence we have on the supplier i.e. whether we need the support of other companies to aid in implementing change or whether we can do this ourselves.

Our Performance Indicators

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

- The number of members of staff trained in Modern Slavery.
- The number of supplier questionnaires completed.
- The number of suppliers mapped.
- The number of suppliers Modern Slavery Statements audited.

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.

Approval for this Statement

This statement was approved by the Board of Directors on 26th April 2019.



Pamela Macdougall
26th April 2019