



Rooted in Nature

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<u>Human Resources Policy &amp; Procedure Manual</u>			<u>Ref: HR/GG2</u>
Section: <b>Employee Relations</b>	<u>Original Date Issued:</u>	<u>Updated Date:</u>	<u>Page</u>
Subject: <b>Modern Slavery and Human Trafficking Policy</b>	<b>2019</b>	<b>2021</b>	<b>1 of 2</b>

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## **Modern Slavery and Human Trafficking Policy**

### **Anti-Slavery and Human Trafficking Policy Statement**

Grieg Seafood Shetland Limited, is committed to developing, maintaining, and supporting a culture of equality, diversity, and inclusion in its workforce and in the planning, design, construction, and operation of the Grieg Seafood Shetland Limited business. We recognise that modern slavery exists within today's society and commonly leads to the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We have a zero-tolerance approach to modern slavery and we are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our obligation to ensure legal compliance under the Modern Slavery Act 2015. We all have a responsibility to be alert to the risks, in our business and in the wider supply chain. This policy applies to all persons working for us or on our behalf in any capacity, including all our employees, directors, volunteers, agents, contractors, consultants, suppliers, and business partners.

### **Responsibility for Our Policy**

The Managing Director has the overall responsibility of ensuring our compliance with all legal and ethical obligations, and for ensuring that all those in the business comply with this policy.

Management at all levels are responsible for ensuring that their members of staff understand and comply with this policy and are given access to suitable training, when necessary.

The prevention, detection and reporting of modern slavery is the responsibility of all of us.

### **Our supply chains and supplier adherence to our values**

The relationship with our suppliers has been established over several years and is built upon mutually beneficial factors, where we have close and personal links and contact with the owners or directors, typically reflecting the fact that we partner with small and medium sized operations as well as large corporations. As and when we engage new contractors or suppliers, we adhere to the Company procurement procedures to establish that they are suitable. To date we have not been made aware of any human trafficking/slavery activities within the supply chain but if any were highlighted to us then we would act immediately in accordance with our legal and moral obligations.

### **Due diligence processes for slavery and human trafficking**

1. Identify and assess potential risk areas when considering taking on new suppliers and regularly review our existing supply chains.
2. Monitor potential risk areas in our supply chains.
3. Protect whistle blowers

**Training**

We are working on providing training on the policy to all employees as we have zero tolerance to slavery and human trafficking. To maintain awareness and ensure the risks of modern slavery and human trafficking are understood our Anti-Slavery and Human Trafficking Policy Statement is emailed to all staff, displayed on company notice boards. This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our company slavery and human trafficking statement for the financial year ending 2020.



**Grant Cumming**  
Managing Director

**March 2021**

**Grieg Seafood Shetland Limited**  
**Modern Slavery and Human Trafficking Policy 2021**

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HR Policy Document Control:

Issued/Updated by:

**HR Advisor**

Endorsed by:

**Grant Cumming, Managing Director**

**Grieg Seafood Shetland Limited**

Signature:



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