

# Code of conduct

---

## **Ethical guidelines**



Contents

- 1. Introduction
- 2. Our mission and values
- 3. Our compliance with laws and regulations
  - i. Transparency
  - ii. Freedom of employment
  - iii. Freedom of association and the right to collective bargaining
  - iv. Working conditions
  - v. Child and young workers
  - vi. Wages and benefits
  - vii. Working hours
  - viii. No discrimination
  - ix. Regular employment
  - x. No harsh or inhumane treatment
  - xi. Environmental
  - xii. Workers’ accommodation
  - xiii. Workforce, subcontractors, agencies and migrant labour
- 4. Our leadership values
- 5. Our health and safety principles
- 6. Our people accreditations
- 7. Our people strategy
- 8. Our media policy
- 9. Acknowledgement
- 10. Useful contacts

1. Introduction

Scottish Sea Farms is an aquaculture company specialising in the farming, and supply of Scottish salmon.

The business has been farming salmon since 1973 and has farms based off the west coast of Scottish mainland, Orkney and Shetland with two freshwater hatcheries, two processing facilities and a dedicated microbiology laboratory.

As of 2021, the company employs a total of 479 people spread across these core regions. Our harvest volume in 2020 was 24kT with the majority coming from mainland, Orkney and Shetland respectively.

We are committed to our staff, gaining a Platinum Award for Investors in People in Q3 2021, and invest heavily to ensure our people have the equipment, training and resources in the execution of their duties.

We are equally committed to the communities we operate in. First launched in 2011, our Heart of the Community fund provides grants ranging from a few hundred pounds to a few thousand pounds to local groups and projects based in our core farming regions. In its first 10 years, the fund has awarded in excess of £1.5M, shared across over 390 good causes in the remote and rural communities in which we work and live.

Ethical working

Slavery and human trafficking remains a hidden blight on our global society and we each have a responsibility to be alert to the risks, however small, whether within our own business or across the wider supply chain.

We are committed to ensuring that there is no such modern slavery or human trafficking in operation; to acting ethically and with integrity in all our business relationships; and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere.

2. Our mission and values

Our mission is threefold.

- We want to:
- Produce seafood from pure Scottish waters at competitive prices, providing quality products adapted to meet our customers’ specific requirements
  - Develop a culture which protects and enhances the values of our employees, and benefits our customers, employees and the communities in which we operate
  - Be a leading producer through innovation and best practice.

Our values

- Whatever our department, whatever our specialism, we share three common values:
- We care... about our fish, our people, our communities and our environment. We’re part of a bigger family that helps one another so that we can all achieve
  - We innovate... constantly striving to do the best job possible by exploring solutions to existing and emerging challenges
  - We never forget our history... where we have come from, what we have learned, how we have grown and how we operate day in, day out; our history is as important as our future.

3. Our compliance with all laws and regulations

We commit to:

- 3i. Transparency in our operations
- We accept unannounced audits should it be deemed necessary
  - As a minimum, Scottish Sea Farms must comply with local law
- 3ii. Freedom of employment
- We shall not use any form of slave, forced, bonded, indentured, or involuntary prison labour, nor shall we be engaged in exploitation or human trafficking, or import goods tainted by slavery or human trafficking. In addition:
- 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 Scottish Sea Farms and are free to leave their employment after reasonable notice
  - Scottish Sea Farms shall have management systems that ensure employment is freely chosen that includes each of the following elements: written policies and procedures, communication and training, monitoring and governance.
- 3iii. Freedom of association and the right to collective bargaining
- Scottish Sea Farms is 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, Scottish Sea Farms shall allow workers to elect their own representatives freely
- Scottish Sea Farms 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
- Scottish Sea Farms personnel shall have a freedom of association and the right to collective bargaining management system that includes written policies and procedures, communication and training, monitoring and governance.
- Ensure that, in the event of a work-related injury, Scottish Sea Farms has an adequate number of employees trained to provide first aid
- Ensure that all personnel receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers
- 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
- Ensure all personnel have the right to remove themselves from imminent danger without seeking permission from the organisation.

3iv. Working conditions

Scottish Sea Farms shall:

- Provide a safe and hygienic workplace environment, bearing in mind the prevailing knowledge of the sector and of any specific hazards
- 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 and safety requirements
- Take adequate steps to prevent potential health and safety incidents and occupational injury, or illness arising out of, associated with or occurring in the course of work, minimising or eliminating, so far as is reasonably practicable, the causes of all hazards in the workplace environment
- 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
- 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 and safety.
- 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
- Scottish Sea Farms 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
- Scottish Sea Farms may employ young workers, but where such young workers are subject to compulsory education laws, they shall work only outside of school hours
- Scottish Sea Farms 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
- Scottish Sea Farms 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
- Scottish Sea Farms shall have a child and young worker management system that includes each of the following elements: written policies and procedures, communication and training, monitoring and 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.*

3vi. Wages and benefits

Scottish Sea Farms shall:

- Ensure that personnel are compensated according to the law including minimum wage, overtime and premium pay
- Ensure that personnel receive equal pay for equal work without discrimination
- Ensure that no deductions are taken from the employees pay as part of any disciplinary action
- Ensure that personnel’s wages and benefits composition are detailed clearly and regularly to them in writing for each pay period
- 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

- Have a wages management system that includes written policies and procedures, communication and training, monitoring and governance.

3vii. Working hours

Scottish Sea Farms 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
- Ensure working hours, excluding overtime, is defined by the contract, and shall not exceed 48 hours per week
- Ensure workers do not work over 12 hours per day, where allowed by local law
- 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
- Ensure that the total hours worked in any 7 days shall not exceed 60 hours
- 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
- Have a working hours management system that includes written policies and procedures, communication and training, monitoring and governance.

3viii. No discrimination

Scottish Sea Farms shall ensure that the environment provided is free from discrimination:

- Scottish Sea Farms 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

- Scottish Sea Farms 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
- Scottish Sea Farms shall not subject personnel to pregnancy or virginity tests under any circumstances
- Scottish Sea Farms shall have a "No discrimination" management system that includes each of the following elements: written policies and procedures, communication and training, monitoring and governance.

### 3ix. Regular employment

- Scottish Sea Farms 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
- Scottish Sea Farms shall ensure that all work performed is on the basis of a recognised employment relationship established through national law and practice.

### 3x. No harsh or inhumane treatment

- Any physical, verbal or threatening abuse, harassment in any form, including intimidation and unethical disciplinary actions, shall be prohibited
- Scottish Sea Farms 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
- Scottish Sea Farms 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

- Scottish Sea Farms 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.

### 3xi. Environmental

#### Scottish Sea farms shall:

- Comply with the requirements of local and international laws and regulations including having necessary permits
- As a minimum, meet the requirements of local and national laws related to environmental standards
- 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
- Have an environmental policy, covering their environmental impact, which is communicated to all appropriate parties, including its suppliers
- Be aware of the significant environmental impact of its site(s) and its processes.

### 3xii. Workers' accommodation

#### Scottish Sea Farms shall ensure that:

- Dormitories, or other housing that is provided, have sufficient living space that meets all emergency safety standards and applicable laws
- Accommodation/dormitories or other housing provided (such as single dwelling homes, or apartments) includes the same standard of living for all residents
- 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 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 metres).

### 3xiii. Workforce, subcontractor agencies and migrant labour

#### Scottish Sea Farms shall not sub-contract unless previously agreed with our clients:

- 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
- Scottish Sea Farms 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

- Scottish Sea Farms shall ensure a full understanding of the entire recruitment process and assess all labour recruiters and intermediaries against legal requirements
- Scottish Sea Farms 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
- Scottish Sea Farms shall implement processes to enable adequate control over agencies with regards to the above points and related legislation
- Scottish Sea Farms shall ensure that employment agencies only supply workers registered with them
- Scottish Sea Farms shall ensure workers do not pay any recruitment fees at any stage of the recruitment process.

## 4. Our leadership values



## 5. Our health and safety principles

Our health and safety strategy is focused around 4Cs – culture, competence, communication, continual improvement – and health and wellbeing:

### Culture

Ensure a culture of care and concern where everyone goes home at night injury free. Develop leadership skills of the entire workforce and create a culture which enables people to stand in their commitment to injury free every day

### Competence

Develop health and safety education which inspires and empowers people to work safely or not at all. Develop an equal emphasis on occupational health

### Communication

Create an environment to enable collaboration and open discussion. Ensure clear, consistent communications utilising a range of channels to reach all stakeholders

### Continual improvement

Ensure we have effective systems, processes and policies in place, and they are adhered to consistently through review, measures and audits

### Health and wellbeing

Focus on workplace, worker and wellbeing. Develop skills and capabilities to preserve, protect and promote the health and wellbeing of our employees so they can be ‘the best they can be’.

## 6. Our people accreditations

Creating jobs and investing in training and development is something we’ve been doing since day one.

In 2012, we formalised this commitment by applying for, and being awarded, Investors in People accreditation; widely seen as the global benchmark in people management.

As such, companies must apply for re-accreditation every three years, showing continual professional development. We’re delighted to say that not only have we successfully retained our accreditation each time, but in 2018 we became only the seventh company in Scotland – and the first salmon grower in the UK – to be receive all three top Investors in People (IIP) awards.

Building on this further, at our most recent accreditation in 2021 we not only retained the We Invest in People Platinum Award and We Invest in Young People Gold Award, but we also scored Gold in the We Invest in Wellbeing Award, becoming just one of two companies in Scotland to do so.

## 7. Our people strategy

Becoming the employer of choice:



**Recent initiatives include:**

- Young Person’s Council
- Management Academy
- SSF Academy for schools and colleges
- University intern programme

## 8. Our social media policy

Being ‘nice’ is a much under-rated quality.

Just by being nice we can encourage openness and trust in others, bringing all sides of a subject to the table to debate, listen, reflect, share, problem solve and quite possibly achieve more collaboratively than individually.

It’s a behaviour we encourage within Scottish Sea Farms and it’s a behaviour we always try to adopt with others outside of the company. So, it’s only natural that we expect to be shown the same simple courtesy in return.

Blocking people from our social media pages or deleting their comments doesn’t seem very nice, nor does it feel very nice, which is why it’s something we are always reluctant to do, even if the comment posted is something we disagree with or know to be inaccurate or false.

However, when people forget their ‘nice’- whether by making unfair or unfounded allegations or by using hurtful, offensive or abusive language – then we reserve our right to withdraw from their presence just as we would if we were addressed that way in any other setting in life.

It’s our way of protecting our team’s mental wellbeing from the impact of sustained verbal abuse or bullying and ensuring they feel safe and respected as they go about their work.

#BeNice

## 9. Acknowledgement

I understand that it is my responsibility to read, to understand, and to keep up to date the contents of the Scottish Sea Farms Code of conduct and to seek clarification or further information, if needed, and to comply with the contents of the Code of conduct.

I acknowledge that I have received a copy of the Code of conduct for my review. I also understand that breach or violation of the Code of conduct may result in disciplinary action (which may include termination of employment).

I further acknowledge that I have been afforded the opportunity to ask any questions I have concerning the content of the Code of conduct.

Signature: .....

Date: .....

Name: .....

## 10. Useful contacts

### Sustainability

For further information about our commitment to sustainable business practices, visit our website: [scottishseafarms.com](http://scottishseafarms.com)

### Code of conduct

To find out more, please contact the Human Resources team directly by emailing [hr@scottishseafarms.com](mailto:hr@scottishseafarms.com)