Thistle Seafoods Ltd
Modern Slavery Statement 2017

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 products. Our 75,000sq ft. factory has eight production lines with advanced portioning, pressure forming and shaping technology as well as a bulk sauce plant and packing line. We employ more than 400 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 AA standards and there are extensive NPD, QC, laboratory and cold-storage facilities on site. We currently supply major retailers and food service companies in the UK, as well as Europe and North America.

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. With regards to fish, the supply chain is long and starts at the fishing boats. From there the raw material can move through various areas and factories before arriving at Thistle Seafoods. In order to mitigate the risk in this area we audit the factories who are closer to us in the supply chain. We ensure that they adhere to the correct standards and understand and observe our Social Compliance Policy. Furthermore, we encourage them to train their staff to be aware of the signs of modern slavery and how to report it.

Our policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Social Compliance 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.

2. Ethical Trading and Agency Labour Policy. This 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.
3. 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.

4. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

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 on site audits which include a review of working conditions. Our Social Compliance 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 taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. We may terminate the contract at any time should any instances of modern slavery come to light.

Training
Our HR department 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 regularly conduct training with our technical and buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain. In addition, there are plans to roll out modern slavery training to the rest of the workforce.

Our performance indicators
We will 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 supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.
- That no internal and external audits identify modern slavery practices are taking place within the organisation or our supply chain.

Approval for this statement
This statement was approved by the Board of Directors on 11th April 2017.

Name: Ryan Scatterty

Signature: 

Date: 14th April 2017