

MODERN SLAVERY ACT – TRANSPARENCY STATEMENT 2021

Mowi Scotland Limited

Mowi Consumer Products UK Ltd

1. Introduction

Mowi is committed to ensuring that there is no modern slavery, human trafficking, or any form of labour exploitation in our supply chain or in any part of our business. This is a global commitment made in our annual corporate report and each business unit is equally accountable and committed to the principles laid out in that annual report.

Mowi's commitment on human rights rests upon internationally recognised human rights principles, as found in The Universal Declaration of Human Rights, the United Nations Global Compact, The United Nations Guiding Principles on Business and Human Rights and the International Labour Organisation's Core Conventions. Mowi also recognises modern slavery compliance as a part of the Mowi values and on Ethical Business Conduct.

This statement sets out steps taken by Mowi in the UK, in the financial year ended 31 December 2021, to assess and understand potential modern slavery risks related to our business and to ensure that any risk of modern slavery or human trafficking is eliminated from our organisation and from our supply chains. We are proud of our commitment to ethical employment practices and of the steps we have taken; and we will continue to work to improve our practices to combat modern slavery and human trafficking.

2. Our Business

Our parent undertaking and ultimate controlling party is Mowi ASA. Mowi ASA, with its head office in Norway, is one of the largest seafood companies in the world, and the world's largest producer of Atlantic salmon, with harvest volumes of 466,000 tonnes in 2021, equivalent to a global market share of approximately 20%. We supply healthy, delicious and sustainably farmed salmon and processed seafood to more than 70 markets worldwide. Mowi ASA employs over 14,000 people, is represented in 25 countries and in 2021 had a worldwide turnover of EUR 4.2 billion. Mowi ASA is listed on the Oslo Stock Exchange (OSE) and its shares also trade on the US OTC market.

Mowi is organised in three separate business areas; Feed, Farming and Sales and Marketing, all of which are represented in the UK.

- Feed comprises of Feed plants based in Norway and Scotland and they produce the food for the fish
- Farming incorporates our farming operations and some Primary processing and filleting activities in Norway, Scotland Canada, Chile, Ireland and the Faroe Islands
- Sales and Marketing includes secondary processing and value-added operation in Europe, the US and Asia and the sales and deliver of our products.

Mowi Scotland Limited farms salmon in the remote waters of the Western Highlands and Islands of Scotland. The organisation provides jobs and supports fragile rural economies in some of the most remote communities in the country. Salmon are reared in hatcheries and fresh water loch farms before they are moved to sea farms

off the west coast. Once grown to market size they are transported by sea to the Harvest Station in the port of Mallaig and onward to the processing plant in Fort William for gutting, packing and distribution to customers, including Mowi CPUK Ltd. We also produce the feed for all of our salmon farms at our Feed Factory based in Kyleakin on the Isle of Skye.

Mowi Consumer Products UK Ltd forms part of Mowi's wider Sales and Marketing operations. It is a seafood processing business, operating in the UK and based in Rosyth, Fife and is a wholly owned subsidiary of Mowi Scotland Limited, supplying own-label and branded seafood to other food businesses, foodservice and retail customers. Mowi also launched its own brand in 2021 and this can be found in a number of UK retailers. Mowi products are currently sold in 7 different retailers in the UK, and are also represented on those retailers websites and in their stores. Products being sold to x non-retail customers.

Figure 1. Mowi Scotland Ltd Structure

Business Unit	Sites	Employees
Farming	5 Hatcheries 48 Farms 1 Harvest Station 1 Primary Processing Plant	Mowi Employees: 692 Agency Workers: 2
Feed	1 Feed Plant	Mowi Employees: 68 Agency Workers: 2
CPUK - Rosyth	1 Secondary Processing Plant	Mowi Employees: 632 Agency Workers: 168

3. Our Supply Chain

Our product supply chains are extensive and global.

3.1 Mowi Scotland Limited

Our supply chain includes the suppliers of raw materials to produce fish feed, as well as suppliers of the materials needed to support our operations including boats, pens, nets and moorings; animal medication and protective clothing and equipment. First-tier suppliers are based around the world.

3.2 Mowi Consumer Products UK

We source Atlantic salmon from Scotland, Ireland and Norway and trout in the UK, within Mowi group. We source paper-based goods from box makers and printers in the UK. Our flexible and rigid plastic packaging is sourced from suppliers based in the UK and Europe. Dry ingredients such as salt, sugar and spices are sourced from producers who have production sites in the UK, Germany and Israel. We source wet ingredients such as lemon juice and rapeseed oil from local processors in the UK or from processors in country of origin. Woodchips and dust are sourced from the UK and Germany.

4. Policies

Our policies set out to all employees the expectation of them, when working at Mowi and we continue to develop these in line with good practice.

4.1 Code of Conduct

As an organisation, we are committed to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. The Mowi Code of Conduct covers the aforementioned and more, and is Mowi's ethical code. The code applies to all employees, officers and directors in the Mowi corporate group worldwide and to all Mowi subsidiaries and controlled affiliates as well as all suppliers.

The Code of Conduct specifically proscribes any use of forced labour, reflecting our commitment to act ethically and with integrity in all our business relationships. The Code of Conduct has been communicated to all Mowi employees. All Mowi employees are expected to make a personal commitment to follow the Code of Conduct and to raise concerns about potential violations promptly. The Code of Conduct can be accessed [here](#) and is available in 7 languages.

4.2 Whistleblowing

Mowi has a confidential reporting channel run by PwC. Employees can report concerns electronically or by phone. Employees have the choice of being anonymous or providing their contact details.

All concerns are reported to Group level and are investigated, the investigator is appointed by group. Group maintain a close link with the investigator and ensure investigations are concluded within 28 days, unless the complexity of the complaint means that longer is required. Non anonymous whistle blowers will get timely feedback and information about the process.

4.3 Human Rights Policy

Mowi's Human Rights Policy describes our commitment to respect internationally recognised human rights in line with the principles and guidance contained in the following;

- The United Nations Guiding Principles on Business and Human Rights
- The International Bill of Human Rights
- The International Labor Organization declaration of Fundamental Principles and Rights at work
- The United Nations Global Compact
- Employment Legislation

4.4 Anti-fraud and Anti-corruption Policy

This policy sets out the governing principles regarding anti-fraud, anti-corruption and general misconduct activities, and describes the requirements for implementation, monitoring and reporting of compliance with these principles.

This policy applies in its entirety to all Mowi Group's activities globally, providing it does not conflict with applicable laws and regulations.

This policy is important to Modern Slavery prevention as it could highlight indications of modern slavery, including cash payments, unusual sources of payments (e.g. countries with which Mowi does not trade), regular payments to individuals or government officials. It also sets out the policy on bribery, kickbacks and facilitation payments and how any incidents would be handled.

4.5 Grievance Policy

This policy sets out how employees can raise a grievance, and the process for investigating and understanding concerns.

4.6 Dignity at Work Policy

This policy sets out our standards for a workplace where employees are treated with dignity and respect. This also contains Mowi's commitment to a workplace free from victimisation, including when raising any complaint or concern about Modern Slavery.

5. Contractual Controls

Our supplier and service provider contracts include strong obligations regarding compliance with modern slavery legislation. Our standard contractual terms, require Modern Slavery Risk Assessment, including;

- A requirement that employment is freely chosen
- Prohibition of involuntary prison labour
- Prohibition of charging deposits to work for a company
- Employees are free to leave their employment
- Prohibition of child labour

6. Assessment of Modern Slavery Risk

Internally we make sure that we assess our risk and keep up with best practice via our relationships with retailers and membership of SEDEX, GLAA and Stronger Together.

All our suppliers are required to sign up to our Suppliers Code of Conduct and confirm their compliance with the Ethical Trade Initiative (ETI) Base Code, via a risk assessment where we request a SEDEX number. Any issues would be highlighted and dealt with upon the review of the completed risk assessment. Suppliers who were unable to meet our requirements, would be prevented from supplying Mowi.

We have identified two areas in our supply chain which we deem at particular risk of providing unscrupulous individuals with an opportunity to force people into compulsory, forced or bonded labour – the suppliers of our ingredients and our agency labour provider.

6.1 Our ingredients

All of our ingredients are subject to technical checks before being used. We have a supplier audit questionnaire which asks for detailed information relating to food safety, quality and legality such as product specification, process and origin. Among other things this will identify country of origin and whether or not the supplier is a SEDEX member. We use this data to evaluate risk. Part of that evaluation is to consider

country of origin and whether or not it represents a higher risk of ethical malpractice. Our assessment of this risk is supported by the use of various on-line tools such as European Rapid Alert system for food and feed (RASFF) and FSA. We are currently having a customised portal set up by SGS which will give us a tailored newsfeed. We also subscribe to Campden BRI and receive email alerts from them. If a supplier is not registered with SEDEX, we will ask for further information on ethical standards and policies. If a raw material is sourced from a high risk country we will also seek further information about ethical standards and policies.

6.2 Our agency labour provider

As a direct response to our assessment of the supply of temporary agency labour to be at particular risk of modern slavery or human trafficking, in addition to standard supplier practices, the requirement for ethical employment practices (including measures to prevent forced labour) is now specifically built into our Service Level Agreement with our temporary agency labour provider. We check and monitor their licence with the Gangmasters and Labour Abuse Authority (GLAA) and undertake monthly audits to ensure that appropriate pre-employment checks are carried out; that there are ongoing checks on addresses and bank accounts associated with multiple workers; and that workers and jobseekers are not charged directly or indirectly any fees or costs for the work-finding service. In addition, a session on tackling hidden labour exploitation including the Stronger Together video is part of all inductions for new staff and agency workers, during which we encourage our employees and agency workers to report cases of hidden third-party labour exploitation that occur at work and within their communities through appropriate channels.

7. Due Diligence and assessment of Suppliers and Supply Chain

Our supply chain supports our operational requirements and includes suppliers for protein raw materials; simple and complex ingredients and components; and printed and unprinted packaging items. All our suppliers are required to sign up to our Suppliers Code of Conduct and confirm their compliance with the Ethical Trade Initiative (ETI) Base Code, via a risk assessment where we request a SEDEX number. Any issues would be highlighted and dealt with upon the review of the completed risk assessment.

To ensure all those in our supply chain and contractors comply with our values and ethics, all Mowi employees working with suppliers and contractors must:

- ensure that third parties agree to comply with relevant aspects of the Code of Conduct prior to entering into a business relationship (The Mowi Supplier Code of Conduct, which includes prohibitions on forced and compulsory labour, can be accessed [here](#));
- provide these parties with information about policy requirements; and
- take appropriate action, up to and including terminating a contract, upon concluding that any supplier has failed to follow Mowi's requirements.

All Mowi employees who are authorised to establish or manage business relationships with suppliers receive training each year on the requirements of the Code of Conduct (including the prohibition of forced labour in our supply chains); and, to measure

understanding, are required to pass a formal assessment on this training on an annual basis.

8. Training and Development

All employees and workers joining the business are trained in modern slavery via a training module, which is a mandatory requirement of their induction. This provides information on what modern slavery is, how to recognise the signs and makes them aware of what channels are available to them for raising concerns.

All Mowi employees working in roles where there is a responsibility for line management, or who are based within the HR, Finance, IT, Commercial or Supply Chain teams, receive training each year on the requirements of the Code of Conduct (including the prohibition of forced labour in our business or in our supply chains); and to measure understanding, are required to pass a formal assessment on this training on an annual basis.

Members of our HR, Procurement and Technical teams have attended external training, delivered by Campden BRI and the GLAA, on Agency Labour and the Prevention of Worker Exploitation; with our Head of HR and Purchasing Manager having additionally undertaken training on Ethical Trade in the Supply Chain.

9. Partnerships and Collaborations

9.1 Ethical Trading Initiative

Mowi Scotland is a member of the Ethical Trading Initiative, which is an organisation that works with business to tackle the complex challenges global supply chains bring. Membership allows us to see best practice developing and be at the forefront of this. Additionally, we implement the Ethical Trading Initiative (ETI) Base Code, which is a set of employment standards based on the International Labour Organisation (ILO) conventions, recognised globally to drive improvement in employment practices and working conditions.

9.2 Gangmasters and Labour Abuse Authority (GLAA)

Mowi is a member of the GLAA, a public body created to protect vulnerable and exploited workers. Primarily they act as a national enforcement agency to protect workers from labour exploitation. Our agency labour providers are registered and we can check their report each year.

9.3 Scotland Against Modern Slavery (SAMS)

Mowi is a founding member and sponsor of SAMS. This is a group of food and drink manufacturers, construction firms and logistics businesses who meet regularly to share good practice, and work with the government to provide industry insight and support survivors.

9.4 SEDEX

SEDEX is a platform that allows Mowi to share data with our supply chain, based on the ETI base code. This data is updated regularly. Mowi connects with customers and suppliers on this, in order to view each others data. Members are audited on the content of this and their compliance with the ETI basecode.

9.5 Stronger Together

Membership of stronger together provides Mowi with training, resources, business services and collaborative programmes which are focussed on work free from exploitation.

10. Key Performance Indicators, Progress and Next Steps

10.1 Key Performance Indicators

Key Performance Indicator	2021 Performance
Any and all incidents or complaints of modern slavery or human trafficking reported internally or through the confidential whistleblowing channel are investigated within 24 hours	0 received
Numbers of staff trained on our Code of Conduct and assessed on this training	All new joiners ✓ 397 repeat assessments
Remedial action taken following non-compliances found during audits	5 found (These were clerical errors only or system issues) <ul style="list-style-type: none">• all non-compliances closed out;• investigations undertaken & root causes identified;• prevention measures in place to prevent recurrence.

10.2 Progress

This has been an exceptional year for Mowi, both Brexit and Covid-19 have caused unprecedented disruption to us, our customers and suppliers. We have worked in partnership with both our customers and our suppliers to continue to ensure due diligence around modern slavery.

All staff undertook a refresher on our modern slavery training to ensure this was at the forefront of their minds at this difficult time.

Mowi became a sponsor of Scotland Against Modern Slavery (SAMS) which launched in March 2021 and has engaged in each working group session to develop our knowledge base, understand the ever developing best practice and participate in opportunities to provide feedback to the Scottish Government in this forum.

Mowi's most material human rights risks were assessed and identified on a global scale in 2021, this included Modern slavery, child labour, and forced labour.

10.3 Next Steps

In 2022, Mowi globally are aiming to strengthen the efficacy of our human rights due diligence process, with a particular focus on supply chain. This includes a step by step review of all processes including; global policies, risk assessment, risk management and mitigation, tracking of results and KPI's, communication, remedy and learning.

Locally in the UK, we intend to develop a Modern Slavery and Child Labour Remediation Policy. These will set out how Mowi and its suppliers' operationalise their commitment to workforces that are free from child labour and modern slavery. However, it also details the remediation process should, a child or modern slave be found to be working for Mowi or one of its suppliers.

Mowi Consumer Products UK Ltd, intends to achieve the ability to become a UKVI sponsor. This will require extra due diligence in relation to modern slavery, this will be scoped out and implemented.

Mowi will complete the Stronger Together Questionnaire and Progress Reporting Tool, and use this to monitor progress on Modern Slavery.

Additional training on modern slavery is planned for line managers, not in specialist roles.