



MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

This policy applies to all persons working for us or on our behalf in any capacity, including all employees, directors, agency workers, volunteers, apprentices, contractors, external consultants, third-party representatives and business partners.

Holemasters Scotland Ltd will comply fully with *Modern Slavery Act 2015*. Modern slavery a violation of fundamental human rights and is a crime and. There are various forms, such as slavery, servitude, forced and compulsory labour and human trafficking. These deprive a person's liberty by another to exploit them for commercial or personal gain. We have a zero-tolerance approach to modern slavery and are committed to acting ethically, with integrity in all aspects of our business and relationships to implement and enforce effective systems and control measures to ensure modern slavery never takes place in our own business or that of any part of our supply chain.

Our approach to tackling modern slavery in our own business and throughout our supply chain is the active promotion of transparency which is consistent with our disclosure obligations under the *Modern Slavery Act 2015*. We expect the same high standards from all contractors, suppliers and business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

Child labour - We will not employ workers under the legal minimum age for work as stipulated by the Employment Act 2008.

Forced labour - We will not make use of any forced labour or debt-bondage labour in accordance with the Modern Slavery Act 2015.

Discrimination - We will not discriminate against any person based on their protected characteristics, and will uphold Article 14 of the Human Rights Act 1998 in respect of protection from discrimination.

Discipline - We will not inflict corporate punishment, physical coercion or verbal abuse. Any disciplinary matter will be dealt with through formal procedures.

Working hours - Working time directives will be adhered to as per the Working Time Regulations 1998 with opt out clauses communicated to staff.

Remuneration - Wages paid for standard working hours will meet or exceed national minimum wage or living wage levels as appropriate.

Responsibilities

Directors – have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.

Procurement - has primary and day-to-day responsibility for implementing this policy, monitoring its use, effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management - line management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

Employees – must read, understand and comply with the policy are they are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the director.



Compliance

- You must ensure that you read, understand and always comply with this policy.
- You must avoid any activity that might lead to, or suggest, a breach of this policy.
- We will assess the risk to our business from modern slavery within our supply chain.
- It is the responsibility of all those working for us or under our control to detect, prevent and report modern slavery in any part of our business or supply chain.
- Notify management immediately if you believe or suspect any conflict with this policy has occurred, or may occur in the future.
- All staff are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of the business or supply chain immediately.
- If you are unsure about whether the treatment of workers, working conditions or any act within our business or supply chain warrants any form of modern slavery, report it to management immediately.
- Communicate this policy to all and raise awareness of this policy
- Provide training on this policy. It is included in the induction process for all individuals who work for us, and regular training will be provided as necessary.
- Our zero-tolerance approach to modern slavery is communicated to all suppliers, contractors at the start of our business relationship with them and it will be reinforced as appropriate.

Breaches of Policy

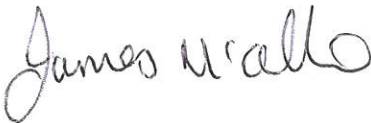
If you believe or suspect a breach of this policy has occurred or may occur, you must notify management immediately.

Employees - Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

Supply chain – Where possible we will ensure that working conditions throughout our supply chain meets internationally accepted standards of human rights and working conditions. We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

We encourage openness and transparency and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. No one will suffer any detrimental treatment from reporting any suspicion of modern slavery in our own business or supply chain. Detrimental treatment includes unfavourable treatment, dismissal, disciplinary action, bullying or threats connected with raising a concern. If you believe that you have suffered any such treatment, you must inform management immediately. If the matter is not remedied, it must be reported to the director or senior management.

This policy will be reviewed by the Managing Director on an annual basis.

Name: James McArthur	Signed: 
Date: 8/1/19	Job Title: Director