

POLICY

Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our modern slavery and human trafficking policy.

Policy Objectives

At Buccleuch we have developed and published this Policy to demonstrate our commitment to implementing effective systems to prevent modern slavery and human trafficking.

POLICY STATEMENT

We are committed to ensuring, to the best of our ability, that there is no modern slavery or human trafficking in any part of our business including our supply chains or by third parties with whom we partner with.

Being based in the UK with very limited direct supply chains, we see our business as 'low risk' in relation to the threat of slavery and human trafficking offences being committed. If, however, this risk is identified, we will carry out compliance audits on an appropriate sample size and on a regular basis.

These audits will:

- Ensure that all our employees are paid at least the National Minimum/Living Wage and have the right to work in the UK.
- Be carried out by our internal audit team
- Reported to our Audit Committee and Board.

Slavery and human trafficking is considered and addressed in our approach to corporate social responsibility and any concerns can be raised either by contacting our HR Team or through our whistleblowing procedure.

Training on this topic is provided to employees who are involved in the management of our supply chains.

Buccleuch will publish and regularly review this Policy, a copy of which will be available on the homepage of the company website and also included within our employee handbook.

GLOSSARY OF TERMS

Modern-day slavery / human trafficking: The recruitment, transportation, transfer, harbouring, or receipt of persons by improper means (such as force, abduction, fraud, or coercion) for an improper purpose including forced labour, bonded labour, child labour, forced marriage, domestic servitude or sexual exploitation.

DMS

Document Title: **Anti-slavery & Human Trafficking Policy**

Version: 3



APPROVAL

This Policy is signed and approved by Benny Higgins, Executive Chairman.

Signed: *Benny Higgins*

Date: 8 April 2019

Review

This Policy will be reviewed on a regular basis and a printed copy can be obtained by contacting kbarclay@buccleuch.com.