



Modern Slavery Statement 2018-19

Scotbeef Ltd issued our first Modern Slavery Statement in October 2016 and a further update in January 2018. This statement sets out Scotbeef Ltd's actions to understand potential modern slavery risks related to our business and **how we have and continue** to put in place steps that aim to ensure that no slavery or human trafficking takes place in our business or our supply chain. We are committed to preventing slavery and human trafficking in all our activities and to ensuring our supply chain is free from slavery and human trafficking.

Our statement covers Scotbeef Ltd, across all six sites, and its non-trading parent company JW Galloway Ltd; all references to Scotbeef should read to incorporate JW Galloway. We currently operate both abattoir and production facilities in the United Kingdom.

Responsibility for our anti-slavery initiative is as follows:-

- **Modern Slavery statement update:** The Board of Directors is responsible for ensuring the statement is up to date and accurately reflects our actions and initiatives to tackle slavery and human trafficking. The Board has nominated Mr Ian Bentley as our named Director in accordance with our Stronger Together commitment.
- **Policies:** The HR Team is responsible for introducing policies and reviewing the process by which they are developed.
- **Training:** The Board, HR and Supply Chain teams all have team champions who have undertaken Stronger Together training. Combining elements of the Stronger Together toolkit, we have developed and rolled out training for all colleagues. The two programmes initiated in 2017 ensure all colleagues are aware of Scotbeef's commitment to addressing Modern Slavery and preventing Hidden Labour Exploitation in our business and through our Supply Chain and the tools to personally support that process. The 2nd tier programme for all managers and supervisors, continues to be developed and rolled out, ensures an increased level of awareness for managers and how they can actively support the work of Scotbeef Ltd, our customers, the Scottish Government, the official protection bodies (GLAA, Police Scotland etc) and the industry task force in this area and extend the reach of learning through our supply chain. In addition, the HR team has joined one of the key Scottish task forces and has worked throughout 2018 and will continue to share best practice and support extending learning and implementation of awareness and prevention strategies into further industries and sectors.
- **Recruitment and Labour Provision**

Our commitment to tackling modern slavery and hidden labour exploitation extends throughout our business. A key aspect of managing this issue is being addressed through stringent recruitment and labour management practices. At Scotbeef Ltd, in addition to independent ethical audits, we have revised our recruitment and labour procurement processes to best provide visibility of any at risk person or practice and commit these processes and ongoing review. We have developed our own labour management audits and spot checks and have implemented the use of Stronger Together tools which we systematically use to help identify modern slavery and hidden labour exploitation in our own business, labour providers and supply chain.

Relevant Policies

At Scotbeef Ltd, the following policies support our approach to identifying modern slavery risks and taking steps to prevent slavery and human trafficking in our business:

- Our Equal Opportunities policy demonstrates our commitment to being fair and just in dealings, contracts and agreements with employees, agency workers, contracted workers, suppliers and customers.
- Our Preventing Hidden Labour Exploitation policy sets out how we aim to tackling hidden labour exploitation and provide all employees and workers with the support and appropriate channels to raise concern.

Due Diligence

We commit to taking due diligence when considering using new suppliers and when reviewing our existing suppliers. Our ongoing due diligence and review process includes:

- Tackling Modern Slavery and Hidden Labour Exploitation – board approved 3 year and annual plans. We have now delivered 2 annual plans and continue to develop our programmes and invest resource to support these.
- Mapping out supply chain broadly to assess particular risks of modern slavery and human trafficking – including investing in access to supplier data to verify our own supply chain
- Evaluating these risks in respect of each new supplier
- Using Sedex, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular and implementing a schedule with all existing and new suppliers for them to be on Sedex and provide us with a link to their ethical Self-Assessment Questionnaire
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Training

The training developed for all colleagues for induction includes:

- Scotbeef Ltd's commitment to ethical trading and the ETI base code, tackling modern slavery in our organisation and through our supply chain and to preventing hidden labour exploitation
- How to identify the signs of slavery and human trafficking;
- What initial steps to take if slavery and human trafficking is suspected;
- How to escalate potential slavery or human trafficking issues to relevant parties within the organisation or to the relevant authorities;
- What external help is available, for example through the Modern Slavery Helpline, Gangmasters Licensing Authority, the ALP, Police Scotland and Border Control and the Stronger Together initiative

Awareness-Raising Programme

Our colleague training, which includes the Stronger Together video in every induction session and we have already raised awareness of modern slavery issues by placing posters across the organisation providing the information from the Stronger Together initiative on:-

- How to identify the signs of slavery and human trafficking;
- What employees can do to flag up potential slavery and human trafficking issues to the relevant authorities; and
- What external help is available, for example through The Gangmasters Licensing Authority and Modern Slavery Helpline.
- We continue to roll out the Stronger Together colleague questionnaire to investigate and offer support to our own colleagues and workers from our labour providers

- Additional training for managers and supervisors includes modern slavery and human trafficking precautions in the recruitment process and through contractor and supply chain interactions

We also conduct an annual review of our progress using Stronger Together Scorecard to help develop our action plans and measure our progress.

For and on behalf of Scotbeef Ltd

Ian Bentley
Board Director

Dated: 16 November, 2018