

<b>Document Title</b>	Anti-Slavery and Human Trafficking Policy	
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<b>Document Approval</b>	Douglas Leask	
<b>Applicability</b>	All Company Management team	
<b>Pages</b>	3	

## **ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY**

### **1.0 Purpose**

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). This policy’s use of the term “modern slavery” has the meaning given in the Act. Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. This document sets out the policy of Leask Marine Limited with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain.

### **2.0 Scope**

As a Company we have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own businesses or those of our suppliers.

### **3.0 Responsibilities and Requirements**

We are committed to ensuring there is transparency in our business and in our approach to tackling modern slavery through our supply chain, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect our suppliers to hold their own suppliers to the same high standards.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chain, we acknowledge that we do not control the conduct of individuals and organisations in our supply chain.

To underpin our compliance with practical steps, we have implement the following measures:

-  Where necessary we will conduct a risk assessment of our suppliers to identify if any are at risk of modern slavery so that efforts can be focused on those areas.
-  Where appropriate we will engage with our suppliers to convey to them our Anti-Slavery Policy and to gain an understanding of measures taken by them to ensure modern slavery is not occurring.
-  Where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls.
-  Introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

## RESPONSIBILITY FOR THE POLICY

Ultimate responsibility for the prevention of modern slavery rests with the Managing who has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations.

All managers are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery.

## ACTIONS TO REPORT MODERN SLAVERY OR HUMAN TRAFFICKING

Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees directly to the Managing Director.

Employees can contact the Managing Director if they:

- ☉ Suspect a person seeking to exploit another in a way which could amount to modern slavery;
- ☉ Suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
- ☉ Received an approach from a person acting on behalf of the Company who has invited them to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- ☉ They have information which leads to the rational conclusion that a person acting on behalf of the Company or its suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Reports to the Suspicious Activity are kept in confidence, subject to the need for Leask Marine to act responsibly and within the law. The source of reports to the Line will be kept confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures for the prevention of modern slavery being committed on our behalf or in any element of our supply chain.

## SAFEGUARDS

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. The Company will accept and take seriously concerns communicated anonymously.

However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

## COMMUNICION AND AWARENESS OF THIS POLICY

Our zero-tolerance approach to modern slavery will be communicated to suppliers, contractors at the outset of our business relationship as necessary and reinforced as appropriate thereafter.

#### **4.0 Review and Monitoring**

This procedure will be reviewed as part of the Company's internal audit programme and reviewed annually.

Signed: 

Name: Douglas Leask, Managing Director

Date: 1<sup>st</sup> January 2020