

## **1.0 Introduction**

This Modern Slavery and Human Trafficking Statement is a response to section 54 (1) of the Modern Slavery Act 2015 and relates to actions and activities for the financial year ending 31 December 2021

We are committed to preventing slavery and human trafficking violations in our own operations, our supply chain and our products. We have zero tolerance towards slavery and making this statement shows our commitment to ethical trading principles and to set out the steps we are continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chains.

We also recognise that many of our clients/customers will be seeking reassurances from us about our compliance with the requirements of the Modern Slavery Act.

This policy applies to all persons working for us or on behalf in any capacity including employees at all levels.

## **2.0 Our Structure and Business**

The Company is based in the South West of Scotland. Established in 1909 and is made up of 4 brands operating under different trading brands;

- Dundas Chemical Company (Mosspark) Ltd – operating in the environmental sector in the UK and overseas.
- Dundas Transport Ltd – operating in the UK
- Oakbank Waste Management Ltd – operating in the recycling and waste management sector in the UK and overseas.
- Oakbank Plant Hire Ltd – operating in the UK

## **3.0 Policy Statement**

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. The Company has a zero-tolerance approach to any form of modern slavery. The Company is committed to acting ethically and with integrity in all our working practices, business dealings and relationships. The Company is also committed to implementing and enforcing effective

systems and controls to ensure modern slavery is not taking place anywhere in our business or in our supply chains.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner:

- **Recruitment Policy.**  
We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
- **Ethical, Diversity and Inclusion Policy.**  
To ensure equal opportunities for all employees and job applicants irrespective of characteristics protected under legislation. The policy also sets out the Company's stance on valuing a diverse workforce.

#### **4.0 Our Supply Chains**

All senior management and all staff responsible for procuring these services are dedicated to ensuring that said suppliers always adhere to our ethos and support our compliance to the Modern Slavery Act 2015.

All staff involved in the procurement of our suppliers must establish that they are dealing with trusted supply chains and to discuss potential risks with regards to new supply chains.

Our zero-tolerance approach to modern slavery must be communicated to call suppliers at the outset of our business relationship with them and reinforced as appropriate thereafter.

#### **5.0 Due Diligence**

The Company maintains a preferred suppliers list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that organisations have never been convicted of offences relating to modern slavery and on-site audits which include a review of working conditions. We continually monitor systems to ensure that the Company does not support or deal with businesses or individuals knowingly involved in slavery and human trafficking.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business
2. They hold their own suppliers to account over modern slavery
3. They pay their employees at least the national minimum wage/national living wage (as appropriate); They pay their employees any prevailing minimum wage applicable within their country of operations (Overseas suppliers)
4. We may terminate the contract at any time should any instances of modern slavery come to light.

## **6.0 Training**

The Modern Slavery Act 2015 is unlikely to be relevant to the majority of our employees as they are not involved in the procurement of suppliers or recruitment of employees.

Therefore, we will conduct training for all employees who are involved in recruitment and the procurement of suppliers as well as including Modern Slavery as part of our Induction to increase knowledge and awareness of modern slavery.

We will know the effectiveness of the steps that we are taking to ensure that modern slavery and human trafficking is not taking place within our businesses by; there being no reports received from employees, the public or law enforcement agencies to indicate that modern slavery and human trafficking practices have been identified.

This statement was approved by the Chairman and Directors of Dundas Chemical Company Ltd.

John Bogie, Chairman  
Anne Bogie, Director  
Stephen Bogie, Director  
David Bogie, Director