

McGregor Boyall Modern Slavery and Human Trafficking Policy

Modern Slavery Act 2015

Modern slavery is an international crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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.

The Modern Slavery Act 2015 designed to tackle slavery in the UK and consolidates previous offences relating to trafficking and slavery. The act extends to England and Wales became law on 26 March 2015.

As part of recruitment and staffing industry we recognise that we have a responsibility to take a robust approach to slavery and human trafficking.

McGregor Boyall is absolutely committed to preventing slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Clients

McGregor Boyall recognises that some of the sectors in which its clients operate will be more susceptible to human trafficking and slavery than others, but we are fully committed to ensuring the highest standards, irrespective of sector. We believe that, in conjunction with policies implemented by our clients, we can drive out any aspects of human trafficking and slavery from ours and our clients' supply chains. Whenever applicable, McGregor Boyall will identify to its clients any non-compliance with the legislation.

Supply Chain

McGregor Boyall recognises that some of the sectors in which its clients operate may be more susceptible to human trafficking and slavery than others, but McGregor Boyall is committed to driving high standards across all of our supply chains, irrespective of sector. We believe that, in conjunction with the rigorous policies implemented by our clients, we can drive out any aspects of human trafficking and slavery from ours and our clients' supply chains.

As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains; and
- Protect whistle blowers.

McGregor Boyall operates a supplier policy and maintains a preferred supplier 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 particular organisation has never been convicted of offenses relating to modern slavery. Our anti-slavery policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

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. (For UK based suppliers) They pay their employees at least the national minimum wage / national living wage (as appropriate)
4. (For international suppliers) They pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery come to light.

Our Policies

This policy runs in conjunction with a number of internal policies employed by McGregor Boyall to ensure that we are conducting business in an ethical and transparent manner.

These include:

- *Equal Opportunities Policy:* This policy sets out our stance as an equal opportunities employer.
- *Human Rights Policy:* This policy sets out our commitment stance to protecting and promoting respect for human rights.
- *International Labour Policy:* this policy outlines our commitment to complying with all international labour standards, as well as UK legislation.
- *Whistleblowing Policy:* We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.

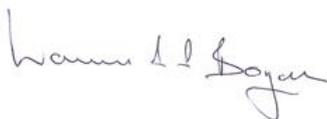
Responsibility

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for McGregor Boyall or under its supervision or control. All persons are required to avoid any activity that might lead to, or suggest, a breach of the law or a violation of human rights. All employees are actively encouraged to report any suspicious activity or circumstances to the Modern Slavery Helpline on 0800 0121 0700.

McGregor Boyall's Leadership Team believe that driving out slavery in any form from its supply chains is fundamental and central to the aims and values of McGregor Boyall. Accordingly the McGregor Boyall Leadership Team has approved this policy in line with McGregor Boyall's Statement on Modern Slavery and Human Trafficking.

This Modern Slavery and Human Trafficking Policy and accompanying statement will be reviewed annually, unless there is a requirement to review it more frequently.

Signed:



Laurie Boyall
Group CEO, McGregor Boyall Associates Ltd