## Anti-slavery & Human Trafficking Policy



### **OUR BUSINESS**

Buccleuch represents the business interests of the Buccleuch family and is a diverse enterprise focused on all aspects of appropriate land use. The key strategic drivers are forestry, agriculture, rural property, energy, retail & hospitality, commercial property & heritage.

We have a diverse supply chain across our business and Buccleuch is committed to ensuring that all of its business operations are free from involvement with slavery or human trafficking.

#### **POLICY**

#### Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking policy for The MDS Estates Ltd and all subsidiary companies (referred to here as 'Buccleuch').

# **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**

Robust process are in place to ensure that all our employees are paid at least the minimum statutory rates of pay and have the right to work in the UK.

As a UK-based company with very limited direct supply chains, we see most of our business as 'low risk' in relation to the threat of slavery and human trafficking offences being committed. However, if we identify a risk in relation to our supply chains we will carry out compliance audits on a regular basis.

One of our businesses, Restoration Yard, makes a significant number of purchases from a wide range of suppliers and therefore represents our highest supply chain risk. To mitigate any risks, current and new regular suppliers are assessed and audited on an annual basis, and any supplier who cannot provide assurance of their practice will no longer be used.

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 via our whistleblowing procedure.

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

Buccleuch will regularly review and develop this policy, a copy of which is available in the Buccleuch Colleague Handbook and on <a href="https://www.buccleuch.com/">https://www.buccleuch.com/</a>.

## **APPROVAL**

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

Signed: Date: 28 October 2019