

John R Adam & Sons Ltd.,

Glasgow.

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT.

At John R Adam & Sons (Holdings) Ltd., we have a zero- tolerance approach to modern slavery , and are fully committed to preventing slavery and human trafficking in our operation and supply chain. We have taken concrete steps to tackle modern slavery as outlined in our statement. This statement sets out the actions that we have taken to understand all potential modern slavery risks related to our business , and to implement steps to prevent slavery and human trafficking during the financial year 2018.

Our business and supply chain:



We are located in Scotland and England.

We establish a relationship of trust and integrity with all our suppliers , which is built upon mutually beneficial factors . Our supplier selection includes due diligence of the supplier’s reputation , respect for the law , compliance with health , safety and environmental standards , and references.

We haven’t been made aware of any allegations of human trafficking/slavery activities against any of our suppliers , but if we were , then we would act immediately against the supplier and report it to the authorities.

Risk assessment :

In the past year , we conducted a risk assessment of our supply chain by taking into account :

- The risk profile of individual countries based on the Global Slavery Index.
- The business services rendered by the suppliers.
- The presence of vulnerable demographic groups.
- A news analysis and the insights of labour and human rights groups.

This assessment will determine our response and the risk controls that we implement.

Policies :

John R Adam (Holdings) operates the following policies for identifying and preventing slavery and human trafficking in our operations:

Whistleblowing policy : we encourage all employees,customers and suppliers to report any suspicion of slavery or human trafficking without fear of retaliation.

Code of conduct – our code encourages employees to do the right thing by clearly stating the actions and behaviour expected of them when representing the business.

Supplier due diligence:

John R Adam Ltd conducts due diligence on all new suppliers and on existing suppliers at regular intervals . This includes:

Assessing risks in the provision of particular services.

Auditing the suppliers , and their health and safety standards & labour relations.

Requiring improvements to substandard employment practices.

Awareness :

John R Adam (Holdings) has raised awareness of modern slavery informing the workforce of :

Our commitment in the fight against modern slavery.

Red flags for potential cases of slavery or human trafficking.

How employees should report suspicions of modern slavery.

This statement covers 1st April 2017 to 31st March 2018 and has been approved by the board of John R Adam & Sons at the board meeting on 12th March 2019.

D.S.McWatt.
Financial Director.

29th March 2019