

# SLAVERY AND HUMAN TRAFFICKING STATEMENT



This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (“**MODSA**”) and sets out the steps that J. & J. Denholm Limited and its subsidiaries (together “**Denholm**”) have taken to ensure that slavery and human trafficking is not taking place in any part their businesses or in their supply chains.

## **DENHOLM**

Denholm prides itself on running its businesses to a high standard of ethical conduct and social responsibility. It is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its businesses.

At the centre of this ethos is the group’s ethics policy – The Denholm Standard – which reflects its commitment to acting ethically and with integrity in all its business relationships. This policy is based around four principles:

- Upholding the law
- Integrity
- Fairness
- Respect

Under the Respect principle Denholm is committed to respecting the people it works with and to providing a healthy, safe and satisfying environment for its staff to work in, which is free from harassment and discrimination. The Fairness principle dictates that all staff are treated fairly and the Upholding the Law Principle dictates that the group complies with all applicable laws and regulations, including MODSA.

## **SUPPLY CHAINS**

During 2016 Denholm developed a Supplier Code of Conduct and began circulating this to suppliers in 2017. This document includes a section on human rights requiring that each supplier must:

- Conduct operations in a manner that is free from harassment and discrimination.
- Comply with all applicable minimum wage and working hours regulations.
- Recognise the principle of freedom of association and the right to collective bargaining.
- Not be involved in slavery (use of forced, bonded or compulsory labour).
- Not use child labour.
- Ensure that its operations are not involved in human trafficking.

Under this Code of Conduct Denholm expects each of its suppliers to have policies and procedures in place, aimed at ensuring that slavery, human trafficking and child labour is not present within its supply chains. Denholm has updated its modern slavery risk assessment and identified that certain suppliers have a perceived higher risk of slavery, human trafficking or child labour being present in their supply chains, though this risk is still believed to be relatively low in view of the type of services that these suppliers provide. In view of this higher risk status, a questionnaire is being developed which these suppliers will be required to complete.

## **BOARD APPROVAL**

The board of directors of J. & J. Denholm Limited approved this statement at its meeting of 12 June 2020 and this is our statement for the financial year ended 31 December 2019.

Signed for and on behalf of J. & J. Denholm Limited

John S Denholm  
Chief Executive