



**David MacBrayne**  
Serving Scotland's Islands



<b>Modern Slavery Statement 2019</b>	
Statement No:	1
Effective Date:	31 March 2019
Version Number:	V1
This Version Status:	Final
Next Review Date:	31 March 2020
Purpose:	The Company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.
Scope:	All David MacBrayne Group employees, Agency Workers and Contractors.
Policy Owner:	HR
Approved:	
Position	C.E.O.
Date of Approval	29 <sup>th</sup> March 2019.

## **Introduction**

This statement is made pursuant to section 54 of the Modern Slavery Act 2015. It constitutes David MacBrayne Limited's (DML) slavery and human trafficking statement for the financial year ended 31 March 2019. This statement covers the activities of DML which procure goods and services from and form part of DML's supply chain.

DML recognises that it has a responsibility to take a robust approach to slavery and human trafficking and indeed takes a zero tolerance approach to non-compliance with the Act in any part of its business or its supply chain.

## **Our Organisation**

David MacBrayne Limited is wholly owned by Scottish Ministers. It is the UK's largest ferry operator and one of the largest transport operators in Scotland, providing essential lifeline services and logistical support to island and remote communities. DML has a number of subsidiaries, including ferry operators CalMac Ferries Ltd, a human resource subsidiary David MacBrayne HR (UK) Ltd and Solent Gateway Ltd (SGL), a joint venture with GBA (Holdings).

We employ around 2000 staff and our Head Office is based in the United Kingdom. Our staff is largely directly employed and is not in any category which is generally seen to be vulnerable to modern slavery in this country, so our focus is to ensure there are policies and procedures in place for our contractors and suppliers.

## **Our Supply Chain**

Our supply chain is made up of a large number of third party providers, many of which are small and medium sized enterprises (SMEs). We procure a large and varied range of goods, works and services from local suppliers through to operation services such as goods for refit of vessels.

## **Our policy on slavery and human trafficking**

We remain committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business with a zero tolerance for non-compliance.

This statement reflects that commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

DML currently operates under the following policies, which ensures business is conducted to the highest ethical standard:

- Procurement Policy
- Whistleblowing Policy
- Recruitment Policy
- Health and Safety Policy
- Grievance Policy

- Harassment and Bullying Policy

DML's formal tendering will assess compliance within the existing supply chain and will also assess any new suppliers for compliance with the following criteria:

- No forced labour or human trafficking is practised and employment is freely chosen
- Working conditions are safe and hygienic
- Working hours are not excessive
- A fair wage is paid
- No child labour is exploited
- No harsh, cruel or degrading practices are allowed
- No discrimination is practised

A failure to comply with the above criteria is an absolute bar to pre-qualification as a supplier.

Our Supplier Form is now being updated and will include reference to Modern Slavery within the Business Probity section to ensure there is no unethical behaviour by our suppliers.

### **Due Diligence**

We will work and monitor our suppliers to ensure that they minimise any modern slavery risks in our supply chain. This includes those who support the procurement of goods and materials for use and particularly where those goods and materials are acquired from other suppliers.

Our suppliers must:

- communicate with DML on their governance, policies, training and supply chain management processes; annually and
- prior to sourcing, provide full detail of the supply chains they are proposing to commission goods from on behalf of DML.

Other steps that we have taken to reduce the risk of modern slavery in our business are:

1. We pay all our employees above the National Living Wage.
2. Our Whistleblowing policy gives a platform for our employees to raise concerns and 'blow the whistle' on any wrong-doing within the Organisation and to raise concerns about poor working practices. Our Whistleblowing policy specifically recognises Modern Slavery.
3. All procurement staff undertake regular CPD training which includes ethical issues such as Modern Slavery.

### **Training**

During the year, we have continued to provide advice and guidance to those teams who have direct responsibility for relevant supply chains and our Procurement team will attend a specific Modern Slavery training course.

### **Looking Ahead**

We will continually review and develop policies and procedures to identify, assess and monitor potential risk areas in our supply chains.

**Approval**

This statement has been formally approved by the Board of DML and the Directors of DML and signed on their behalf.