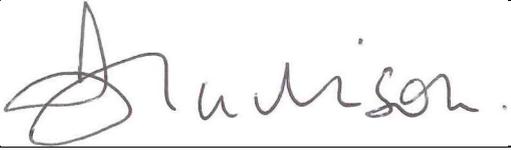




David MacBrayne
Serving Scotland's Islands



Modern Slavery Statement 2022	
Statement No:	4
Effective Date:	1st April 2022
Version Number:	V1
This Version Status:	Final
Next Review Date:	31 st March 2023
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, secondees, agency workers, external consultants, service providers and contractors.
Policy Owner:	HR Director.
Approved:	
Position	Chief Executive Officer
Date of Approval	7 April 2022

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 2022 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 1600 staff and our Head Office is based in the United Kingdom. Our staff are 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 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 many local and national suppliers which help support many areas of our business. These include support services, operations, commercial, asset management and HSQE.

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

Tendering Process

DML's formal tendering process, assesses compliance of bidders using the Single Procurement Document (SPD). The SPD allows bidders to be assessed and where appropriate excluded in line with Public Procurement legislation such as The Public Contracts (Scotland) Regulation 2015.

Grounds for selection and exclusion allow DML to effectively pre-qualify bidders.

Prior to onboarding suppliers to DML's ordering systems, where a formal procurement process has not been required, a new supplier form is issued, which includes references to the Modern Slavery Act, and our statement, within a business probity section to ensure there is no unethical behaviour by our suppliers.

Due Diligence

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, secondees, agency workers, external consultants, service providers and contractors to raise concerns and 'blow the whistle' on any wrong-doing within the organisation and raise concerns about poor working practices.
3. All procurement staff are kept up to date on Modern Slavery legislation via CIPS and from updates from Scottish Procurement where and when legislation changes.

Training

We have continued to provide advice and guidance to those teams who have direct responsibility for relevant supply chains and our Procurement team have been briefed with regards to the updated Modern Slavery Act statement published in April 2022.

We have also continued to provide training to our recruitment team to ensure that all recruitment is ethical, fair, inclusive and transparent.

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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 signed on their behalf.