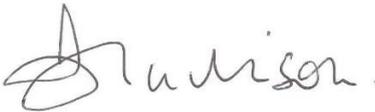




David MacBrayne
Serving Scotland's Islands



Modern Slavery Statement 2021	
Statement No:	3
Effective Date:	31 March 2021
Version Number:	V1
This Version Status:	Final
Next Review Date:	31 March 2022
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	Chief Executive Officer
Date of Approval	6 th April 2021.

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 2021 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 1500 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 many 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 includes references to Modern Slavery Act, and our statement, within the Business Probity section to ensure there is no unethical behaviour by our suppliers.

Due Diligence

We will work with, 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, agency workers 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 continue to undertake regular training which includes ethical issues such as Modern Slavery.

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 March 2021.

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

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.