

## **Our Modern Slavery Statement**

This statement solely covers East Coast Viners Grain (Drumlithie) Limited ('East Coast Viners Grain'). Our Modern Slavery Statement demonstrates that East Coast Viners Grain is fully committed to eliminating slavery and human trafficking in our own operations and will require that our suppliers have the same commitment. In turn, we hope that our suppliers hold their own suppliers to the same standard.

Modern slavery is a crime resulting in an abhorrent abuse of the human rights of vulnerable workers. It can take various forms, such as slavery, servitude, forced or compulsory labour and human trafficking. East Coast Viners Grain have a zero-tolerance approach to modern slavery and are committed to acting ethically, with integrity and transparency. This statement on Modern slavery is referring to the financial year 2019 - 2020.

### **Introduction to the East Coast Viners Grain**

East Coast Viners Grain is one of Scotland's largest players in the animal feed industry. We employ 60 members of staff to serve our large customer base throughout Scotland. Our Milling division is registered to manufacture medicated feeds for our customers, and we are fully approved under the feed industry's Universal Feed Assurance Scheme (UFAS).

East Coast Viners Grain plays a proactive role in eradicating modern slavery and support the 'Stronger Together' initiative, promoting best practice within our organisation and that of our suppliers. We incorporate our policies and procedures into everything we do to ensure slavery and human trafficking is stopped. We strive to work with our suppliers to build effective and transparent supply chains.

### **East Coast Viners Grain Policies in Relation to Modern Slavery**

East Coast Viners Grain policies clearly state that we do not tolerate child labour or forced labour in our operations or that of our suppliers. We will not knowingly use any organisation to supply goods or workers whom use practices which are not tolerated in our organisation. We conduct internal audits to ensure our high standards, policies and practices are being met and attend seminars which provide us with up-to-date legislation to ensure compliance throughout our sites. If our managers, leaders or third-party organisations fail to act upon concerns of workers being mistreated, it will be regarded as gross misconduct or breach of contract and will be treated in the correct manner, either via disciplinary procedure or contractual termination process. Where possible, East Coast Viners Grain use trusted local companies with whom we have long standing relationships.

- **Whistleblowing Policy-** East Coast Viners Grain encourages employees to make disclosures about activities they have concerns about, including child labour, slavery and human trafficking, within our organisation and that of our suppliers. Our policy is designed to protect employees from suffering detriment or termination of employment for whistle blowing, which, may otherwise occur. East Coast Viners Grain Whistleblowing Policy is outlined in our Handbook which is issued to all staff at the beginning of employment.

- **Anti-bribery policy-** This policy clearly states that staff must not accept gifts or cash in exchange for services. Any gifts from customers or suppliers must be declared to Line Managers.
- **Recruitment Policy-** East Coast Viners Grain will not use an organisation to supply labour if they use practices of forced labour, human trafficking or any other form of exploitation. East Coast Viners Grain does not, nor intends to use agency workers. East Coast Viners Grain interview new workers in person and appropriate information is gathered to ensure that to our knowledge the individual is not taking part in modern slavery. East Coast Viners Grain does not discriminate against any protected characteristics outlined in The Equality Act 2010. Prior to workers beginning employment, we require them to provide appropriate information to prove they're eligible to work in the UK. Regular checks are carried out on employee's addresses to ensure that several employees are not living at the same address in overcrowded accommodation. East Coast Viners Grain does not partake in child employment due to the nature of our business. Employees' working hours are determined by the Working Time Directive.

East Coast Viners Grain can confirm that to our knowledge workers are not subject to modern slavery and if we have any suspicion or evidence of third-party labour exploitation, we will report to the Gangmasters & Labour Abuse Authority (GLAA) immediately.

We will review our policies regularly to ensure they reflect current best practice and will add other appropriate policies as they are identified.

### **Due Diligence**

East Coast Viners Grain accepts that it has a responsibility through its due diligence processes to ensure that workers are not being exploited, that they are safe, and that relevant employment, health and safety and human rights laws and standards are being adhered to, including freedom of movement and communications.

Over the past 12 months, East Coast Viners Grain have undertaken the following activities:

- East Coast Viners Grain consider due diligence when seeking new suppliers and conduct supplier reviews annually.
- We pay employees in excess of the National Minimum and Living Wage. When paying employees' (via electronic bank transfer), we ensure the bank account is that of the employees, either individual or joint.

During 2019-20, East Coast Viners Grain will undertake the following activities:

- Deliver training sessions to staff procuring goods and services.
- Embed the Modern Slavery Act 2015 into all relevant East Coast Viners Grain policies.
- Create Anti-slavery & human trafficking policies.
- Make staff aware of the Modern Slavery Act 2015 and inform them of the appropriate action to take if they suspect a case of slavery or human trafficking.

**Our Performance Indicators**

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if no reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

**Relevant Training**

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to our staff, so they know how to identify exploitation and modern slavery and how to report suspected cases.

The company's zero tolerance approach to modern slavery will be communicated to all suppliers, contractors and other business partners when entering into new or renewed contracts with them.

This statement will be reviewed and published annually.

This document is signed and approved on behalf of the Board of Directors at the East Coast Viners Grain.

Signed.....*Graham Forbes*.....

Date.....*28/3/19*.....

Graham Forbes

Director of East Coast Viners Grain (Drumlithie) Limited.