



## **SCOTS BEARINGS LIMITED MODERN SLAVERY POLICY (Modern Slavery Act 2015)**

This Policy applies to all companies within and associated to Scots Bearings Limited (referred to in this Policy as 'The Organisation').

Scots Bearings Limited registered office at Union Plaza (6<sup>th</sup> Floor), 1 Union Wynd, Aberdeen AB101DQ currently operates from 5 branches located throughout Scotland at Aberdeen, Inverness, Dundee, Glasgow and Irvine and offsite at Harlow in Essex, England.

The main activity of the Organisation, which is controlled by a Board of Directors, is the stockholding and supply of bearings and power transmission products.

The Organisation performs the sale of the aforementioned products through the processing of telephone, email and trade counter enquiries. Demand for our product is consistently high throughout the year and is therefore not seasonal.

The labour supplied to Scots Bearings Limited in pursuance of its operation is carried out in the United Kingdom.

The Group considers that modern slavery encompasses:

- Human trafficking;
- Forced work, through mental or physical threat;
- Being owned or controlled by an employer through mental or physical abuse or the threat of abuse;
- Being dehumanised, treated as a commodity or being bought or sold as property;
- Being physically constrained or to have restriction placed on freedom of movement

Scots Bearings Limited acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. Scots Bearings Limited understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Scots Bearings Limited does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to Scots Bearings Limited in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases exceeds those minimums in relation to its employees.



In order to fulfil its activities, Scots Bearings Limited's main supply chains include those related to the supply of goods from various suppliers in both the United Kingdom and abroad.

In general, Scots Bearings Limited considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Scots Bearings Limited carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Scots Bearings Limited has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, Scots Bearings Limited has taken the following steps to ensure that modern slavery is not taking place:

Scots Bearings Limited intends to review our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery;

Scots Bearings Limited has adopted a zero tolerance policy towards modern slavery.

Together this policy, our Corporate and Social Responsibility Policy and our recruitment policy defines Scots Bearings stance on modern slavery.

Scots Bearings Limited has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to Scots Bearings Ltd.'s obligations in this regard.

In pursuance of Section 54(1) of the Modern Slavery Act 2015 this policy will be reviewed each financial year.

David Jackson  
Managing Director

Date 7<sup>th</sup> January 2019