

Slavery and Human Trafficking Policy

Overall Statement of Principles

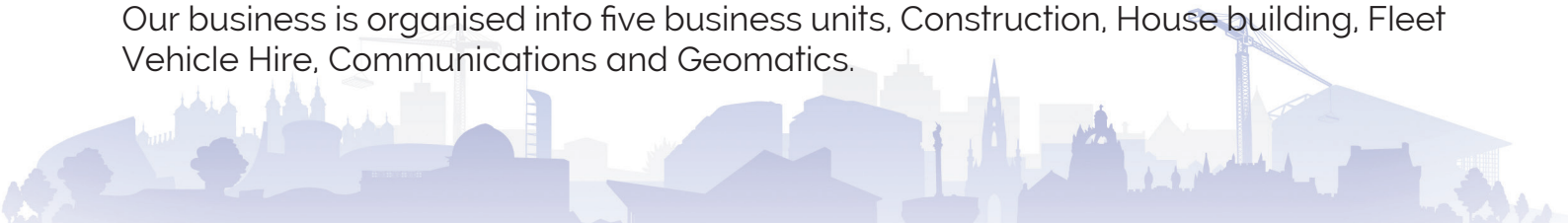
Slavery and Human Trafficking remains a hidden blight on our global society. We all have a responsibility to be alert to the risks, however small, in our business and in the wider supply chain. Staff members are expected to report concerns and management are expected to act upon them.

Organisation's Structure

We are a group of several companies, Ogilvie Group Limited being the parent company. The group has its head office in Stirling, Scotland, and all offices are based in the United Kingdom and Northern Ireland. The Ogilvie Group has an annual turnover in excess of £250 million.

Our Business

Our business is organised into five business units, Construction, House building, Fleet Vehicle Hire, Communications and Geomatics.



Our Supply Chains

Our supply chains include the sourcing of raw material principally related to the provision of construction and house building, cars, light commercial vehicles and IT equipment.

Our commitment to ensuring no Slavery and Human Trafficking

We are committed to ensuring that there is no modern slaves or human trafficking in our supply chains or in any part of our business. This policy reflects our 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 chain.

Due diligence processes for Slavery and Human Trafficking

As part of our initiative to identify and mitigate risk –

- ▶ We manage offices and sites with dedicated management teams to ensure optimum control of the work environment;
- ▶ We limit the geographical scope of our business to ensure optimum supervision of our operating units;
- ▶ Where possible we build long standing relationships with local and national suppliers and make clear our expectations of business behaviour;
- ▶ With regards to national or international supply chains, our point of contact is preferably with a UK company and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity in the supply chain to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the supply chain;
- ▶ We have in place systems to encourage the reporting of concerns and the protection of whistle blowers.



Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

The Ogilvie Group Directors are responsible for compliance in their respective companies departments and for their supplier relationship.

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 provide training to relevant members of staff. All Directors have been briefed on the subject.

Effectiveness in combating Slavery and Human Trafficking

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- ▶ Completion of Management Audits by Directors, Managers and Business Development Managers;
- ▶ Use of labour monitoring and payroll systems ensuring that the National Minimum Wage is the current remuneration paid;
- ▶ Level of communications and personal contact with next link in the supply chain and their understanding of, and compliance with, our expectations.

This policy is made pursuant to section 54 of the Modern Slavery Act 2015 and constitutes our group's slavery and human trafficking statement for the current financial year.

 By order of the Board
Ogilvie Group