

Modern Slavery Statement

Date of issue: March 2019
Date of next review: March 2020

The Ogilvie Group is committed to improving our practices and driving out acts of modern day slavery and human trafficking from within our company and from within our supply chains, and recognises that it has a responsibility to take a robust approach.

The company also acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within our organisation and with our suppliers of goods and services.

This is our first statement under section 54 of the Modern Slavery Act 2015 and sets out the steps we are taking in order to minimise the risk of modern slavery in our company and supply chain.



Organisation's Structure

We are a group of 6 main operating 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 units include Construction, House-building, Fleet Vehicle Hire, Land and Building Surveying, Vehicle Claims Handling and Security and Governance Professional Services.

Our approach to policy and procedure encompasses all areas of the group portfolio. For the avoidance of doubt, this Modern Slavery Act Transparency Statement covers not only the Ogilvie Group but each of the individual trading businesses listed below that meet the requirements identified in the Modern Slavery Act.

Company	Company No
▶ Ogilvie Group Ltd	SC029219
▶ Ogilvie Homes Ltd	SC091421
▶ Ogilvie Construction Ltd	SC069644
▶ Net Defence Ltd	SC116592
▶ Ogilvie Fleet Ltd	SC067027
▶ Malcolm Hughes Land Surveyors Ltd	01319080
▶ Active Auto Solutions Ltd	09682107

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.

As a result of our diverse business structure, our engagement with the external supply chain has developed to provide the sourcing of subcontract services, products and materials direct from the manufacturers and through third-party distribution channels and the provision of agency labour.

We are fully committed to making sure that no business practices – either internally or through our external supply chain – that would contravene Section 54, clause 5 of the Modern Slavery Act are tolerated.

We have a zero tolerance to slavery and human trafficking.



Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our companies. We are committed 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. We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

Slavery and Human Trafficking Policy. This policy sets out the organisations stance on modern slavery and human trafficking and explains how employees can identify any instances of this.

Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our company or supply chain, without fear of reprisals.

Code of Conduct. This code explains the manner in which we behave as a company and how we expect our employees and suppliers to act.

Recruitment Policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking.

Human Rights Policy. This policy focuses on fostering an open and inclusive workplace based on human rights through our fair employment practice.

Policies are updated regularly, and most recently, our policies on how we effectively manage, access and report information on security and privacy to reflect compliance to the new Data Protection Act 2018 and GDPR.

Any breach of the Ogilvie Group policy will be regarded as a serious matter and will result in appropriate actions being undertaken.

Due Diligence and Risk Assessment

Compliance with this policy forms part of all employees' obligations under their contract of employment. Employees are required to familiarise themselves with all policies and procedures to assist in the identification of criminal acts.



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.

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 and Awareness

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 awareness to all employees and training where appropriate.



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:

- ▶ 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.
- ▶ We operate, maintain and monitor a Preferred Supplier List and Supplier Service Level Agreement and we conduct due diligence on all suppliers before allowing them to become a preferred supplier.
- ▶ We will only use reputable recruitment agencies and will continue to carry out Right to Work and pre-employment checks on all employees joining our organisation and that they are paid directly into an appropriate personal bank account.

In the coming year we will seek to measure how effective we have been to ensure that modern slavery is not taking place in any part of our company or supply chain.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our companies slavery and human trafficking statement for the Financial Year 2018.

This statement was approved by the Board of Directors on 7 March 2019 and signed on its behalf by:



7th March 2019

John F Watson
Group Financial Director

