



BS EN ISO 9001  
BS EN ISO 14001  
BS OHSAS 18001



# LEITHS MODERN SLAVERY STATEMENT

## OBJECTIVE

Leiths (Scotland) Ltd is committed to ensuring that neither its employees, contractors nor its suppliers, use slave labour or engage in human trafficking in accordance with the Modern Slavery Act 2015.

## SCOPE

Leiths (Scotland) Ltd specifically prohibits its suppliers from using forced labour of any kind, and the Company's Corporate Social Responsibility Policy and Whistleblowing Policy establish ethical business conduct as critical to our business and our expectation of compliance with applicable laws and legislation.

## GUIDELINES

Leiths (Scotland) Ltd monitors its supply chain for compliance with this statement by engaging in quarterly business reviews.

Leiths (Scotland) Ltd does not generally engage third Parties:

1. To verify product supply chains
2. To evaluate and address risks of human trafficking or slave labour laws
3. Audit suppliers to evaluate supplier compliance with company standards for trafficking and slavery in supply chains

However, Leiths (Scotland) Ltd will promptly and thoroughly investigate any claim or indication that a supplier is engaging in human trafficking or slave labour, or is otherwise not complying with Anti-Slavery guidelines.

Any such claim made would be reported to appropriate personnel such as the Group CEO or to a Company Director, along with the resolution of the claim and/or the findings of the investigation.

Leiths (Scotland) Ltd does not require certification from direct suppliers that materials incorporated into its products comply with laws regarding slavery or human trafficking of the country/countries in which they are doing business.

The management team and all Leiths (Scotland) Ltd Executives have access to this Company Statement, although specific training on eliminating slave labour or human trafficking is not generally provided.

Leiths (Scotland) Ltd will not continue to purchase goods or services from any supplier that is found to be engaging in human trafficking or using slave labour.

Ian Leith  
Chairman  
Leiths (Scotland) Ltd 24/11/16

**LEITHS**

**JOSS**

**LAWRIE**

**MARKON**

**A. ROSS & SONS**

**M&M ROAD SURFACING LTD.**

**NAME:** Corporate Social Responsibility

**REVISED:** July 2014 / August 2015

**PUBLISHED:** July 2012

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#### **OBJECTIVE**

To aid the company operation as well as act as a guide as to what the company stands for, at the same time supporting customers while monitoring and ensuring its active compliance with legislation, and ethical standards. Our aim is to accept responsibility for the company's actions and encourage a positive impact through its activities on the environment, consumers, employees, communities, stakeholders and all other members of the public.

#### **SCOPE**

- To demonstrate these responsibilities through our actions within the policy, ensuring all employees will help maintain our business reputation.
- Managers are responsible for ensuring that their teams are aware of this policy and any future changes to this policy.

#### **GUIDELINES**

- We recognize that our social, economic and environmental responsibilities are integral to our business and aim to demonstrate these through our actions.
- We are open and honest when communicating our policies, strategies, targets and performance in our commitment to continued development.
- Where reasonable will make resources available to fulfill our corporate responsibility.
- Ensure a high level of business performance while minimizing and effectively managing risk.
- The values of honesty and fairness are upheld in our relationships both internally and externally.
- The Board of Directors are responsible for internal control and risk management and the Corrective Action Committee meets monthly to discuss, review and support these controls

#### **CUSTOMERS**

- We take seriously any feedback, complaints and compliments and where possible maintain open discussion to ensure we fulfill the requirements of this policy.
- Will record and resolve our customer complaints in accordance with our set standards.
- Contracts with suppliers have clearly agreed terms and conditions.
- We aim for total customer satisfaction by understanding customer needs and building on partnerships
- We have always placed emphasis on providing high Quality products and services for all our customers.
- We have operated a quality management system in accordance with BS 9001:1994 and then 9001:2000 since 1997. Our IMS allows us to continually improve quality and service.

#### COMMUNITY

- Our community involvement will identify and support local programmes and charities which reach across all social and community backgrounds.
- We aim to develop this through effective partnerships and programmes.

#### ENVIRONMENTAL

- We strive to improve our environmental performance through implementation of sustainable development and environmental policies.
- The Company holds ISO 14001:2004 certificate
- An Environmental Management System has been installed to complement our Quality Management Systems which is a natural progression for better overall management of our business. Our IMS encourages us to operate in a manner that is efficient, minimising waste produced and becoming more environmentally conscious.

#### WORKPLACE

- We offer our employees clear and fair terms of employment and provide support to enable continued development.
- The Company operates an equal opportunity policy for all present and future employees.
- Policies are in place to make sure that all employees are treated with respect and no harassment occurs in the workplace.
- The Company is managed according to strict professional standards

#### HEALTH & SAFETY

- We provide and maintain a clean, healthy and safe working environment.
- All employees are encouraged to raise concerns and have an opportunity to give feedback at the Health & Safety Meetings held at their site/ place of work.
- Supported by the Group H&S Policy.
- We always aim at ensuring all works are carried out with due care and vigilance to both our staff and anyone affected by our works.
- Our IMS takes this to the next level, ensuring that all works not only meet Health and Safety standards and guidelines but also exceed them



## Whistleblowing Policy

Leiths (Scotland) Limited is committed to the highest standards of openness, probity and accountability.

An important aspect of accountability and transparency is a mechanism to enable staff and other members of the Company to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that an employee will faithfully serve his or her employer and not disclose confidential information about the employer's affairs. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing within the organisation then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management (although in relatively minor instances the line manager would be the appropriate person to be told).

The Public Interest Disclosure Act, which came into effect in 1999, gives legal protection to employees against being dismissed or penalised by their employers as a result of publicly disclosing certain serious concerns. The Company has endorsed the provisions set out below so as to ensure that no members of staff should feel at a disadvantage in raising legitimate concerns.

It should be emphasised that this policy is intended to assist individuals who believe they have discovered malpractice or impropriety. It is not designed to question financial or business decisions taken by the Company nor should it be used to reconsider any matters which have already been addressed under harassment, complaint, disciplinary or other procedures. Once the "whistleblowing" procedures are in place, it is reasonable to expect staff to use them rather than air their complaints outside the Company.

### **Scope of Policy**

This policy is designed to enable employees of the Company to raise concerns internally and at a high level and to disclose information which the individual believes shows malpractice or impropriety. This policy is intended to cover concerns which are in the public interest and may at least initially be investigated separately but might then lead to the invocation of other procedures e.g. disciplinary. These concerns could include

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Bribery
- Improper conduct or unethical behaviour
- Attempts to conceal any of these

## **Safeguards**

### **i. Protection**

This policy is designed to offer protection to those employees of the Company who disclose such concerns provided the disclosure is made:

- in good faith
- in the reasonable belief of the individual making the disclosure that it tends to show malpractice or impropriety and if they make the disclosure to an appropriate person (see below). It is important to note that no protection from internal disciplinary procedures is offered to those who choose not to use the procedure. In an extreme case malicious or wild allegations could give rise to legal action on the part of the persons complained about.

### **ii. Confidentiality**

The Company will treat all such disclosures in a confidential and sensitive manner. The identity of the individual making the allegation may be kept confidential so long as it does not hinder or frustrate any investigation. However, the investigation process may reveal the source of the information and the individual making the disclosure may need to provide a statement as part of the evidence required.

### **iii. Anonymous Allegations**

This policy encourages individuals to put their name to any disclosures they make. Concerns expressed anonymously are much less credible, but they may be considered at the discretion of the Company.

In exercising this discretion, the factors to be taken into account will include:

- The seriousness of the issues raised
- The credibility of the concern
- The likelihood of confirming the allegation from attributable sources

### **iv. Untrue Allegations**

If an individual makes an allegation in good faith, which is not confirmed by subsequent investigation, no action will be taken against that individual. In making a disclosure the individual should exercise due care to ensure the accuracy of the information. If, however, an individual makes malicious or vexatious allegations, and particularly if he or she persists with making them, disciplinary action may be taken against that individual.

### **Procedures for Making a Disclosure**

On receipt of a complaint of malpractice, the member of staff who receives and takes note of the complaint, must pass this information as soon as is reasonably possible, to the appropriate designated investigating officer as follows:

- Complaints of malpractice will be investigated by the appropriate Director unless the complaint is against the Director or is in any way related to the actions of the Director. In such cases, the complaint should be passed to the Chief Executive for referral.
- In the case of a complaint, which is any way connected with but not against the Director, the Chief Executive will nominate a Senior Manager to act as the alternative investigating officer.

- Complaints against the Chief Executive should be passed to the Chairman who will nominate an appropriate investigating officer.
- The complainant has the right to bypass the line management structure and take their complaint direct to the Chairman. The Chairman has the right to refer the complaint back to management if he feels that the management without any conflict of interest can more appropriately investigate the complaint.

Should none of the above routes be suitable or acceptable to the complainant, then the complainant may approach the following individual who has been designated and trained as an independent point of contact under this procedure. They can advise the complainant on the implications of the legislation and the possible internal and external avenues of complaint open to them.

The Company will ensure that any internal investigation does not hinder a formal police investigation.

### **Timescales**

Due to the varied nature of these sorts of complaints, which may involve internal investigators and / or the police, it is not possible to lay down precise timescales for such investigations. The investigating officer should ensure that the investigations are undertaken as quickly as possible without affecting the quality and depth of those investigations.

The investigating officer, should as soon as practically possible, send a written acknowledgement of the concern to the complainant and thereafter report back to them in writing the outcome of the investigation and on the action that is proposed. If the investigation is a prolonged one, the investigating officer should keep the complainant informed, in writing, as to the progress of the investigation and as to when it is likely to be concluded.

All responses to the complainant should be in writing and sent to their home address.

### **Investigating Procedure**

The investigating officer should follow these steps:

- Full details and clarifications of the complaint should be obtained.
- The investigating officer should inform the member of staff against whom the complaint is made as soon as is practically possible. The member of staff will be informed of their right to be accompanied by a trade union or other representative at any future interview or hearing held under the provision of these procedures.
- The investigating officer should consider the involvement of the Company auditors and the Police at this stage and should consult with the Chairman / Chief Executive
- The allegations should be fully investigated by the investigating officer with the assistance where appropriate, of other individuals / bodies.
- A judgement concerning the complaint and validity of the complaint will be made by the investigating officer. This judgement will be detailed in a written report containing the findings of the investigations and reasons for the judgement. The report will be passed to the Chief Executive or Chairman as appropriate.
- The Chief Executive / Chairman will decide what action to take. If the complaint is shown to be justified, then they will invoke the disciplinary or other appropriate Company procedures.

- The complainant should be kept informed of the progress of the investigations and, if appropriate, of the final outcome.
- If appropriate, a copy of the outcomes will be passed to the Company Auditors to enable a review of the procedures.

If the complainant is not satisfied that their concern is being properly dealt with by the investigating officer, they have the right to raise it in confidence with the Chief Executive / Chairman, or one of the designated persons described above.

If the investigation finds the allegations unsubstantiated and all internal procedures have been exhausted, but the complainant is not satisfied with the outcome of the investigation, the Company recognises the lawful rights of employees and ex-employees to make disclosures to prescribed persons (such as the Health and Safety Executive, the Audit Commission, or the utility regulators), or, where justified, elsewhere.