

Anti-Slavery Policy Statement

Modern Slavery Act 2015

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

This statement, made pursuant to section 54(1) of the Modern Slavery Act 2015, sets out steps Gray & Adams Holdings Limited has taken and is continuing to take to understand and minimise the potential risk of modern slavery in its business and supply chains. This constitutes our Group's slavery and human trafficking statement for the financial year ending April 2020. Slavery and human trafficking are crimes and a violation of human rights. Gray & Adams Holdings Limited and its subsidiary companies have a zero approach to all forms of slavery and human trafficking.

We are committed to ensuring that there is no modern day slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery 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 chains.

INTRODUCTION

The Gray & Adams Group is committed to driving out acts of modern day and human trafficking slavery from within its own business and from within its supply chains. The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the Organisation.

OUR ORGANISATIONAL STRUCTURE

Gray & Adams is Britain's number one supplier of temperature-controlled semi-trailers and bodywork for trucks and vans, and an acknowledged leader in its field. Established in 1957, the family-owned company operates from headquarters on South Road, Fraserburgh, and boasts an impressive roll call of customers that includes most of the country's leading supermarkets and food retailers, many of which have remained loyal to its products for years. Maintaining correct temperatures while chilled and frozen goods are in transit is crucial and Gray & Adams is renowned for manufacturing high-quality insulated trailers and bodywork that allows road transport operators to do just that. The company also has production facilities in Dunfermline, Doncaster and Belfast. Gray & Adams is proud of its track record of innovation, the build quality of its products, and its consultative approach to sales – unlike its competitors, most of which sell 'off the shelf' products, Gray & Adams will sit down with its customers to discuss their precise requirements, then design and build bespoke equipment that fits the bill perfectly. The company had an annual turnover of £150m and 729 employees across the group in 2020. Our supply chains include various suppliers of Goods and Service both in the UK and overseas.

DUE DILIGENCE PROCESS FOR SLAVERY & HUMAN TRAFFICKING

As part of our initiative to identify and mitigate risk we are in the process of, or have, have put the following in place:

- Advise(d) staff what to do if they suspect a case of slavery and/or human trafficking.
- Make our staff aware of the Modern Slavery Act 2015, including its definitions of slavery and human trafficking.
- Undertake a review of assurance information from existing suppliers and partners.
- Continue to operate a strict procurement process, requiring suppliers to comply with all applicable laws and standards, including those which relate to the Modern Slavery Act.
- Protect whistle blowers.

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The above procedures are designed to:

- Identify and assess potential risk areas in our business and supply chains.
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains.
- Monitor potential risk areas in our business and supply chains.

Non-compliance

If we find a supplier is non-compliant with our policies or code of conduct or provides inadequate information, we may consider terminating the business relationship as soon as possible.

James Gray

Joint Group Managing Director
September 2020