



Transparency Statement on Human Trafficking and Modern Slavery 2025 (In compliance with the Modern Slavery Act 2015 (the "Act"))

Organisation

This statement applies to all companies wholly owned or controlled by Gray & Adams Holdings Ltd (referred to throughout as "the Organisation"), including Gray & Adams Ltd, Gray & Adams (Dunfermline) Ltd, Gray & Adams (Doncaster) Ltd, Gray & Adams (Ireland) Ltd, and Gray & Adams Group Ltd.

The Organisation has a zero-tolerance approach to modern slavery and human trafficking of any kind within our business or supply chains.

Organisational Structure

Gray & Adams Holdings Ltd, which is located at South Road, Fraserburgh, Scotland, AB43 9HU, serves as the company's head office. Gray & Adams (Dunfermline) Ltd, Gray & Adams (Doncaster) Ltd, Gray & Adams (Ireland) Ltd, Gray & Adams Ltd, and Gray & Adams Group Ltd are subsidiary companies reporting to Gray & Adams Holdings Ltd. The Group is controlled by a board of directors who have overall responsibility for this policy and for reviewing the effectiveness of actions taken in response to concerns raised under it.

Gray & Adams is a UK market leader in the manufacture of specialist temperature-controlled and dry freight equipment for the transport industry. The Organisation performs the sale of these products. Demand for our products is consistently high throughout the year and is therefore not seasonal. We have around 750 people working across our four UK sites: Fraserburgh, Dunfermline, Doncaster, and Northern Ireland.

The labour supplied to the Organisation in pursuance of its operations is carried out in the United Kingdom.

The Gray & Adams Group has a turnover of £208.3 million.

Responsibility

Responsibility for our anti-slavery initiatives is as follows:

- Our **Group Human Resources Manager** is the key contact for issues relating to modern slavery and human trafficking within our operations.
- The **Group Purchasing Manager** has day to day operational responsibility for this policy and must ensure that all managers and other employees who may deal with suppliers, contractors or others involved in the supply chain receive regular and appropriate training in order to ensure they tackle the Organisations commitment to complying with the provisions in the Modern Slavery Act.

Transparency statement on Human Trafficking and Modern Slavery for financial year 2024/2025, HR Version 2, Gray & Adams
30/05/25

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Training on modern slavery awareness is provided to relevant employees involved in recruitment, procurement, and supplier management.

Definitions

The Organisation 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 having restrictions placed on freedom of movement
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Commitment

The Organisation acknowledges its responsibilities in tackling modern slavery and is committed to complying with the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its workforce and its supply chains.

The Organisation does not enter into business with any organisation, in the United Kingdom or abroad, which knowingly supports or is found to be involved in slavery, servitude, or forced or compulsory labour.

No labour provided to the Organisation in the pursuance of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required under employment legislation in Scotland, England, and Northern Ireland, and in many cases exceeds those minimums in relation to its employees.

Supply Chains

To fulfil its activities, the Organisation deals with a wide range of suppliers across several categories, based mainly within the UK and Europe. We understand that these suppliers can act as intermediary traders and may have further contractual relationships with lower-tier suppliers.

Annual reviews of each supplier are conducted, during which we gather information regarding their own supply chain and policies. If anything is discovered during this process, immediate action is taken to ensure compliance with our policies.



Potential Exposure

In general, the Organisation considers its main exposure to the risk of slavery and human trafficking to be relatively limited. Nonetheless, steps have been taken to ensure that such practices do not occur within our business or that of any organisation supplying goods and/or services to us.

Steps

The Organisation 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.

The Organisation 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, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery
 - measures in place to identify and assess the potential risks in its supply chains
 - Supplier onboarding processes that require disclosure of modern slavery policies and risk management procedures
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Key Performance Indicators

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains:

- A supplier onboarding questionnaire asks if the supplier has their own policy on modern slavery.
 - Percentage of relevant employees trained on modern slavery risks
 - Number of suppliers reviewed annually through our due diligence process
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Policies

The Organisation supports this statement through the following policies:

- Group Corporate Social Responsibility (CSR) Policy
- Group Whistleblowing Policy
- Group Recruitment Policy

These policies form part of our commitment to ethical business practices and compliance with relevant legislation, including the Modern Slavery Act 2015. The **CSR Policy** now explicitly



references our zero-tolerance approach to modern slavery and human trafficking, and outlines expectations for our employees, suppliers, and partners.

Slavery Compliance Officer

The Organisation has a designated Slavery Compliance Officer, **Martin Wilson (Group Purchasing Manager)**, to whom all concerns regarding modern slavery should be addressed. He is responsible for taking appropriate action in line with the Organisation's obligations.

Statement Approval

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and relates to the financial year ending 30 April 2025. It is effective from 30 May 2025.

The Group HR Manager, in conjunction with the Board, will review this statement from both a legal and operational perspective at least once per year.

Approved by the Board of Gray & Adams Holdings Ltd on 30 May 2025.

Signed:

A handwritten signature in black ink, appearing to be "JJ Gray", written over a horizontal line.

James J Gray OBE
Group Joint Managing Director

Date of approval: 30 May 2025

Print name: James J Gray OBE