



Modern Day Slavery Statement

This statement is prepared to align to S54 of the Modern Slavery Act 2015 and sets out the steps that Lomond Fine Foods has taken, and is continuing to take, to make sure that modern slavery or human trafficking is not taking place within our business or supply chain

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Lomond Foods has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Lomond Fine Foods operates a food Wholesale and Distribution service across Scotland and employs 120 staff over two sites

The Company is aware of our responsibilities towards customers, employees and the local community and expect all suppliers to the Company to adhere to the same ethical principles.

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our internal policies replicate our commitment to acting ethically and with integrity in all our business relationships

Currently all awarded suppliers sign up to our terms and conditions of contract which contain a provision around Good Industry Practice to ensure each supplier's commitment to anti-slavery and human trafficking in their supply chains; and that they conduct their businesses in a manner that is consistent with Lomond Fine Foods anti-slavery policy

In addition, an increasing number of suppliers are implementing the Labour Standards Assurance System (LSAS) as a condition of contract for tenders within high risk sectors and product categories and indeed this has been referenced in the Government's Modern Slavery Strategy. Many aspects of the LSAS align to the seven reporting

2 areas that the Government has outlined and should appear within any slavery and human trafficking statement.

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1.

Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all directly employed staff, and agencies on approved frameworks are audited to provide assurance that pre-employment clearance has been obtained for agency staff, to safeguard against human trafficking or individuals being forced to work against their will

2.

Equal Opportunities. We have a range of controls to protect staff from poor treatment and/or exploitation, which comply with all respective laws and regulations. These include provision of fair pay rates, fair terms and conditions of employment, and access to training and development opportunities

3.

Safeguarding policies. We adhere to the principles inherent within both our safeguarding children and adults policies. These are compliant with the Lomond Fine Foods agreements and provide clear guidance so that our employees are clear on how to raise safeguarding concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain.

4.

Whistle blowing policy. We operate a whistle blowing policy so that all employees know that they can raise concerns about how colleagues or people receiving our services are being treated, or about practices within our business or supply chain, without fear of reprisals

5.

Standards of business conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act. Our approach to procurement and our supply chain includes:

Ensuring that our suppliers are carefully selected through our robust supplier selection criteria/processes Requiring that the main contractor

provides details of its sub-contractor(s) to enable the Company to check their credentials

Randomly request that the main contractor provide details of its supply chain

Ensuring invitation to tender documents contain a clause on human rights issues

Using the standard Supplier Selection Approval Questionnaire (SAQ) that which includes a section on Modern Day Slavery

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We are zero tolerant to slavery and human trafficking and thereby expect all our direct and indirect suppliers/contractors to follow suit. Where it is verified that a subcontractor has breached the child labour laws or human trafficking, then this subcontractor will be excluded in accordance with Regulation 57 of the Public Contracts Regulations 2015.

The Company will require that the main contractor substitute a new subcontractor.

TRAINING

We are looking at ways to continuously increase awareness within our organisation, and to ensure a high level of understanding of the risks involved with modern slavery and human trafficking in our supply chains and in our business.

OUR PERFORMANCE INDICATORS

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

No reports are received from our staff, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

APPROVAL FOR THIS STATEMENT

Name (Director) *David Wilson*

Signature

Date 25.09.18

