

**James Walker (Leith) Ltd (& Subsidiaries per attached list)
Modern Slavery Act Transparency Statement**Introduction

There is no country in the world unaffected by modern slavery. Modern slavery is a growing global problem and at James Walker (Leith) Ltd we take a zero-tolerance approach to all forms of modern slavery throughout our company, subsidiaries and supply chain. We are committed to tackling the issues of slavery, servitude, forced labour and human trafficking and will continue to monitor and improve our policies and procedures to ensure the protection of the human rights of all those who come into contact with our operations.

Structure

James Walker (Leith) Ltd operates within the UK as a group of companies whose businesses cover a range of market sectors, including house building, construction, timber engineering, wholesale timber & logistics and facilities management in healthcare.

The Head Office functions are based in Livingston, Scotland and subsidiary companies operate from various locations in England and Scotland.

Policies

The Group and its component companies are committed to, and have a range of policies that include:

- Equal Opportunities
- Ethical Trading Code of Conduct and Human Rights
- Bribery & Corruption
- Anti-Money Laundering
- Whistle Blowing

Covid-19

In light of the unprecedented challenges that have emerged due to Covid-19, we recognise the importance of working to address the increased risks to the health and safety of our workforce, and to the increased modern slavery risk throughout our supply chain. We have developed new policies and procedures in order to protect and support our own workers during this time, and rights of workers have been addressed and communicated including access to paid sick leave & benefits and the option of home working in accordance with national law and established procedures.

We will continue to be vigilant in our supplier approval procedures and we recognise that the peaks and troughs in employment levels caused by intermittent local and national lockdowns could give rise to temporary labour forces at higher risk of lowered standards in employee rights and freedoms. We are committed to maintaining the high standards expected in members of our supply chain and will not tolerate any decline in treatment of workers that may fall within the broad definition of modern slavery.

Supply Chain

We are committed to purchasing goods and services from providers who operate their businesses in compliance with our policies as listed above and any relevant legislation that reinforces these policies.

Our supply chain partners are based on long term relationships with whom we have common goals and values. Supplies are generally sourced from EU denominated suppliers, with some supplies coming from EFTA countries such as Norway or Switzerland.

All of our timber supplies (which form the vast majority of our imports) are supported by Chain of Custody certification. We are both PEFC (Program for the Enforcement of Forest Certification) and FSC (Forest Stewardship Council) certified and we only purchase timber from suppliers who also have one or both of these certifications. The Sustainable Forest Management and Chain of Custody standards associated with these certifications commit certificate holders to an extensive due diligence process which strictly prohibits the use of slavery, forced labour and human trafficking throughout the supply chain. The social criteria in these standards are based on the International Labour Organisation's Declaration on Fundamental Principles and Rights of Work which, among other things, sets out to eliminate all forms of forced or compulsory labour. All certified members are audited on an annual basis to ensure they continue to adhere to these standards and any loss of certified status would result in the immediate termination of supply.

We expect our supply chain to adhere to our core policies and values while working alongside us in a transparent and compliant relationship. Our main suppliers are routinely reviewed and evaluated on a range of criteria to ensure our ability to best meet the needs of our customers and ensure compliance with legislation. These reviews and evaluations have been updated to include information on slavery & human trafficking with suppliers required to sign up to our policies and to assist in ensuring equivalent requirements are passed back up the supply chain.

Our Ethical Trading Code of Conduct and Human Rights policy requires the following standards to be met by all of our suppliers in terms of employment practices and rights of workers:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practised
- Regular employment is provided
- No harsh or inhumane treatment is allowed
- Environmental impact is managed

We recognise there is more that we can do to ensure modern slavery does not exist within our supply chain. As part of our due diligence system we have developed a geographical risk-based approach to our timber supplier approval procedures. Using data from the Walk Free Foundation's Global Slavery Index we have been able to measure suppliers (based on their country of operation) across three main categories: prevalence of modern slavery, vulnerability to modern slavery and government response. All of our suppliers scored above average in every category and have been classified as low-risk. We intend to use and expand this approach to further monitor our suppliers, and will look for meaningful ways in which we can apply the data and findings to better understand our supply chain, focussing our attention towards any higher risk areas.

We remain committed to exercising vigilance at all times to the risk of slavery and trafficking activities and to ensure our reviews and evaluations of our suppliers are sufficiently thorough to maintain their effectiveness.

Training / Employment

All our staff are employed on terms that comply with current UK Legislation. All of our policies are regularly reviewed and kept up to date and in line with industry best practice and are readily available and accessible to all employees on our internal intranet or from HR. Any updates are sent to relevant staff along with training sessions being carried out where appropriate.

All new job applicants are sourced through reputable recruitment agencies and all prospective employees will be asked to produce the relevant documents to allow us to verify their entitlement to work in the UK. We are committed to providing equal opportunities for all job applicants and workers.

The Group is committed to moving forward from this statement in future years to ensure that our business and our supply chain operates free from enforced labour, human trafficking and slavery.

Approved by the Board of Directors of James Walker (Leith) Ltd
Signed by John Campbell, Director on 24th September 2020.

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Companies within the James Walker (Leith) Group to which the Modern Slavery Act applies:

- James Walker (Leith) Ltd
- Walker Timber Ltd
- Patrick & Thompsons Ltd
- Guildway Ltd
- Walker Timber Engineering Ltd
- WTG Treatment Ltd
- Dundas Estates & Development Ltd
- Woodbridge Timber Ltd

All other Group Companies fall outside of the reporting requirements of the Act.