

MODERN SLAVERY ACT – COMPLIANCE IN PROCUREMENT

Introduction

The Modern Slavery Act was introduced by the Westminster Government to ensure companies and employees take all steps necessary to ensure slavery and human trafficking is not taking place in the business or in any part of the supply chain e.g. customers, suppliers and agency workers.

Forth Ports Limited are committed to understanding more about modern slavery and improving our practices to ensure that slavery and human trafficking are not present in our business or supply chain.

Forth Ports Business Structure

Forth Ports is a dynamic UK-based multimodal ports owner and operator. Our ports are strategically positioned and serve as logistical gateways across the UK. We offer businesses a wide range of diverse, port-related services, and help connect the UK with Europe and the rest of the world.

Forth Ports owns and operates eight commercial ports on the Firth of Forth, the Firth of Tay and the Thames: Tilbury (London), Grangemouth, Dundee, Leith (Edinburgh), Rosyth, Methil, Burntisland, Kirkcaldy.

The business plays an important role in the National and International supply chain both in terms of direct and in-direct supplies and services. Export and import cargo is handled in a variety of modes and stages within the supply chain which can be stored on or off site or moved upward or downward within the chain. We also employ the services of many suppliers, contractors, labour providers and consultants who form part of the supply chain in the indirect category of expenditure which carries the same level of responsibility when ensuring the Modern Slavery Act is being adhered to.

What is modern slavery?

Slavery is a violation of a person's human rights. It can take the form of human trafficking, forced labour, bonded labour, forced or servile marriage, descent-based slavery and domestic slavery. A person is considered to be in modern slavery if they are:

- Forced to work through mental or physical threat
- Owned or controlled by an “employer”, usually through mental or physical abuse
- Dehumanised, treated as a commodity or sold or bought as “property”
- Physically constrained or has restrictions placed on their freedom of movement

What Forth Ports Limited is doing in our Supply Chain

Our zero tolerance on modern slavery and our respect for human rights, including children’s rights, are built into our processes, business practices and internal HR Policies. In the Code of Conduct and Business Ethics Section of our Supplier Welcome Pack it is very clear that companies must adhere to the procedures set out which include the Modern Slavery act.

As part of the due diligence checks we carry out in our preferred vendor process we will be issuing all vendors with a code of conduct which must be adhered to. Copies of the policy will be sent to all vendors participating in the supply of goods, services, labour, utilities and consultancy.

In addition, our CEO, Charles Hammond, has recently written to all employees to raise awareness of the Modern Slavery Act and reaffirms our commitment to “be aware of the unacceptable abuse and brutal treatment of human beings for profit” setting out every employee’s duty to:

- Take Steps to report any potential incidences you become aware of in respect of modern slavery and human trafficking
- Immediately inform Line Management of any suspicious activity in the workplace

- Report any suspicious activity outside of work by calling the Modern Slavery helpline number on 0800 0121700.

We will work with our supply chain partners to ensure that modern slavery is not present in the supply chain and we want all our vendors and customers to think about the steps they can take to provide us with the assurance that:

- Modern slavery is not present in their company
- Safe and fair working conditions are provided
- The risks within their own supply chain are understood
- Specific Key Performance Indicators relating to the Modern Slavery

Zero tolerance, responsible management and compliance with all legal requirements is reflected in relevant policies, procedures, practices and in contracts with our suppliers.

As part of the vendor audit process we will be focusing closely on those we consider to be at greatest risk, including those who:

- Operate by employing casual or temporary labour
- Operate outside of the UK / EU
- Manufacture or trade in raw materials outside the UK/EU
- With whom Forth Ports has a strategic exposure

The use of slavery in the production of goods and services

Typically the products bought nowadays have passed through a long chain of producers, manufacturers, distributors and retailers who have all participated in its production, delivery and sale. It can therefore be very difficult to certify that a product has or has not been produced using slavery. However, the way in which companies operate and manage their supply chain can affect the likelihood of slavery being a part of the final product. The Modern Slavery Act gives responsibility to companies for ensuring that no slavery has occurred, and this applies not only to the products they sell or the services they provide themselves but also to their suppliers, and the suppliers of their suppliers, all the way down the supply chain.

The Modern Slavery Act 2015 – Relevance to Procurement

The Chartered Institute of Procurement and Supply (CIPS) has released some guidance to help small businesses comply voluntarily with the Act; however they suggest that ALL companies:

- Ensure all UK workers receive minimum wage and robust immigration checks
- Map supply chains to identify where there is highest risk and exposure to modern slavery
- Undertake site inspections
- Provide training to employees and local suppliers on modern slavery risks and compliance
- Review supplier contracts to include obligations to comply with the Modern Slavery Act 2015

All of the above form part of our Vendor Assessment process.