

# LEGAL INFORMATION AND WEBSITE TERMS OF USE

Balmoral terms of use, [privacy policy](#), [cookie policy](#) and [Modern Slavery Statement](#).

PLEASE READ THESE TERMS AND CONDITIONS CAREFULLY BEFORE USING THIS SITE

## TERMS AND CONDITIONS OF USE

### 1 What's in these terms?

These terms tell you the rules for using our website <http://www.balmoral-group.com> ("our site").

### 2 Who we are and how to contact us

<http://www.balmoral-group.com> is a site operated by Balmoral Group Holdings Limited ("We"). We are registered in Scotland under company number SC277480 and have our registered office at Balmoral Park, Loirston, Aberdeen, AB12 3GY. Our VAT number is GB 886 755 653. We are a limited company.

To contact us, please email: [marketing@balmoral.co.uk](mailto:marketing@balmoral.co.uk) or telephone our customer service line on +44 (0)1224 859000.

### 3 By using our site you accept these terms

By using our site, you confirm that you accept these terms of use and that you agree to comply with them.

If you do not agree to these terms, you must not use our site.

We recommend that you print a copy of these terms for future reference.

### 4 There are other terms that may apply to you

These terms of use refer to the following additional terms, which also apply to your use of our site:

- Our Privacy Policy; and
- Our Cookie Policy, which sets out information about the cookies on our site.

### 5 We may make changes to these terms

We amend these terms from time to time. Every time you wish to use our site, please check these terms to ensure you understand the terms that apply at that time. These terms were most recently updated in April 2018.

### 6 We may make changes to our site

We may update and change our site from time to time for any reason.

### 7 We may suspend or withdraw our site

Our site is made available free of charge.



We do not guarantee that our site, or any content on it, will always be available or be uninterrupted. We may suspend or withdraw or restrict the availability of all or any part of our site for business and operational reasons. We will try to give you reasonable notice of any suspension or withdrawal.

You are also responsible for ensuring that all persons who access our site through your internet connection are aware of these terms of use and other applicable terms and conditions, and that they comply with them.

## **8 How you may use material on our site**

We are the owner or the licensee of all intellectual property rights in our site, and in the material published on it. Those works are protected by copyright laws and treaties around the world. All such rights are reserved.

You may print off one copy, and may download extracts, of any page(s) from our site for your personal use and you may draw the attention of others within your organisation to content posted on our site.

You must not modify the paper or digital copies of any materials you have printed off or downloaded in any way, and you must not use any illustrations, photographs, video or audio sequences or any graphics separately from any accompanying text. Our status (and that of any identified contributors) as the authors of content on our site must always be acknowledged.

You must not use any part of the content on our site for commercial purposes without obtaining a licence to do so from us or our licensors.

If you print off, copy or download any part of our site in breach of these terms of use, your right to use our site will cease immediately and you must, at our option, return or destroy any copies of the materials you have made.

## **9 Do not rely on information on this site**

The content on our site is provided for general information only which includes any product specifications that are shown on the site. It is not intended to amount to advice on which you should rely. You must obtain professional or specialist advice before taking, or refraining from, any action on the basis of the content on our site.

Although we make reasonable efforts to update the information on our site, we make no representations, warranties or guarantees, whether express or implied, that the content on our site is accurate, complete or up to date.

## **10 We are not responsible for websites we link to**

Where our site contains links to other sites and resources provided by third parties, these links are provided for your information only. Such links should not be interpreted as approval by us of those linked websites or information you may obtain from them.

We have no control over the contents of those sites or resources.

## **11 Our responsibility for loss or damage suffered by you**

Whether you are a consumer or a business user:

- We do not exclude or limit in any way our liability to you where it would be unlawful to do so. This includes liability for death or personal injury caused by our negligence or the negligence of our employees, agents or subcontractors and for fraud or fraudulent misrepresentation.

## **12 If you are a business user:**

- We exclude all implied conditions, warranties, representations or other terms that may apply to our site or any content on it.
- We will not be liable to you for any loss or damage, whether in contract, tort (including negligence), breach of statutory duty, or otherwise, even if foreseeable, arising under or in connection with:
  - use of, or inability to use, our site; or
  - use of or reliance on any content displayed on our site.
- In particular, we will not be liable for:
  - loss of profits, sales, business, or revenue;
  - business interruption;
  - loss of anticipated savings;
  - loss of business opportunity, goodwill or reputation; or
  - any indirect or consequential loss or damage.

## **13 If you are a consumer user:**

- Please note that we only provide our site for domestic and private use. You agree not to use our site for any commercial or business purposes, and we have no liability to you for any loss of profit, loss of business, business interruption, or loss of business opportunity.
- If defective digital content that we have supplied, damages a device or digital content belonging to you and this is caused by our failure to use reasonable care and skill, we will either repair the damage or pay you compensation.



## **14 How we may use your personal information**

We will only use your personal information as set out in our privacy policy.

### **15 We are not responsible for viruses and you must not introduce them**

We do not guarantee that our site will be secure or free from bugs or viruses.

You are responsible for configuring your information technology, computer programmes and platform to access our site. You should use your own virus protection software.

You must not misuse our site by knowingly introducing viruses, trojans, worms, logic bombs or other material that is malicious or technologically harmful. You must not attempt to gain unauthorised access to our site, the server on which our site is stored or any server, computer or database connected to our site. You must not attack our site via a denial-of-service attack or a distributed denial-of service attack. By breaching this provision, you would commit a criminal offence under the Computer Misuse Act 1990. We will report any such breach to the relevant law enforcement authorities and we will co-operate with those authorities by disclosing your identity to them. In the event of such a breach, your right to use our site will cease immediately.

### **16 Rules about linking to our site**

You may link to our home page, provided you do so in a way that is fair and legal and does not damage our reputation or take advantage of it.

You must not establish a link in such a way as to suggest any form of association, approval or endorsement on our part where none exists.

You must not establish a link to our site in any website that is not owned by you.

Our site must not be framed on any other site, nor may you create a link to any part of our site other than the home page.

We reserve the right to withdraw linking permission without notice.

If you wish to link to or make any use of content on our site other than that set out above, please contact: [marketing@balmoral.co.uk](mailto:marketing@balmoral.co.uk)

### **17 Which country's laws apply to any disputes?**

If you are a consumer, please note that these terms of use, their subject matter and their formation, are governed by Scots law. You and we both agree that the courts of Scotland will have exclusive jurisdiction except that if you are a resident of Northern Ireland you may also bring proceedings in Northern Ireland, and if you are resident of England and Wales, you may also bring proceedings in England or Wales.

If you are a business, these terms of use, their subject matter and their formation (and any non-contractual disputes or claims) are governed by Scots law. We both agree to the exclusive jurisdiction of the courts of Scotland.

## **PRIVACY POLICY**

Balmoral Group Holdings Limited respects your privacy and is committed to protecting your personal data. This privacy notice will inform you as to how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you.

### **1 Important information and who we are**

#### **1.1 Purpose of this privacy notice**

This privacy notice aims to give you information on how Balmoral Group Holdings Limited collects and processes your personal data through your use of this website, including any data you may provide through this website.

This website is not intended for children and we do not knowingly collect data relating to children.

It is important that you read this privacy notice together with any other privacy notice or fair processing notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

#### **1.2 Controller**

Balmoral Group Holdings Limited is the controller and responsible for your personal data (collectively referred to as the "Company", "we", "us" or "our" in this privacy notice).



Balmoral Group Holdings Limited is made up of different legal entities, details of which can be found here [Product/Sector menu]. This privacy notice is issued on behalf of Balmoral Group Holdings Limited so when we mention the "Company", "we", "us" or "our" in this privacy notice, we are referring to the relevant company in Balmoral Group Holdings Limited responsible for processing your data. Balmoral Group Holdings Limited is the controller and responsible for this website.

If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the company's Public Relations Manager (mailto:stephen.gibb@balmoral.co.uk?subject=Privacy policy enquiry).

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO so please contact us in the first instance.

### 1.3 Changes to the privacy notice and your duty to inform us of changes

This version was last updated in April 2018.

It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

### 1.4 Third-party links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## 2 The data we collect about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes address, email address and telephone numbers.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- **Profile Data** includes [your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses].
- **Usage Data** includes information about how you use our website, products and services.
- **Marketing and Communications Data** includes [your preferences in receiving marketing from us and our third parties and your communication preferences].

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any **Special Categories of Personal Data** about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

## 3 If you fail to provide personal data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

## 4 How is your personal data collected?

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your Identity, Contact and Financial Data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for information about our products or services;



- subscribe to our publications;
- request marketing to be sent to you; or
- give us some feedback.

- **Automated technologies or interactions.** As you interact with our website, we may automatically collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies. Please see our cookie policy [ADD LINK] for further details.
- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources as set out below:
  - Technical Data from the following parties:
    - (i) analytics providers such as Google based outside the EU;
    - (ii) advertising networks such as LinkedIn based inside OR outside the EU; and
    - (iii) search information providers such as Google based inside OR outside the EU.
  - Identity and Contact Data from data brokers or aggregators based inside OR outside the EU.
  - Identity and Contact Data from publicly available sources such as Companies House and the Electoral Register based inside the EU.

## 5 How we use your personal data

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

Generally we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us.

## 6 Purposes for which we will use your personal data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your personal data where more than one ground has been set out in the table below.

| Purpose/activity                                                                                                                                                               | Type of data                                                                                        | Lawful basis for processing including basis of legitimate interest                                                                                                                                                         |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To register you as a new customer                                                                                                                                              | (a) Identity<br>(b) Contact                                                                         | Performance of a contract with you                                                                                                                                                                                         |
| To process and deliver your order including:<br>(a) Manage payments, fees and charges<br>(b) Collect and recover money owed to us                                              | (a) Identity<br>(b) Contact<br>(c) Financial<br>(d) Transaction<br>(e) Marketing and Communications | (a) Performance of a contract with you<br>(b) Necessary for our legitimate interests (to recover debts due to us)                                                                                                          |
| To manage our relationship with you which will include:<br>(a) Notifying you about changes to our terms or privacy policy<br>(b) Asking you to leave a review or take a survey | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Marketing and Communications                      | (a) Performance of a contract with you<br>(b) Necessary to comply with a legal obligation<br>(c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) |



| Purpose/activity                                                                                                                                                        | Type of data                                                                                                 | Lawful basis for processing including basis of legitimate interest                                                                                                                                                                                                                        |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity<br>(b) Contact<br>(c) Technical                                                                 | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise)<br>(b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you                            | (a) Identity<br>(b) Contact<br>(c) Profile<br>(d) Usage<br>(e) Marketing and Communications<br>(f) Technical | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)                                                                                                                     |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences                                                      | (a) Technical<br>(b) Usage                                                                                   | Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)                                                                               |
| To make suggestions and recommendations to you about goods or services that may be of interest to you                                                                   | (a) Identity<br>(b) Contact<br>(c) Technical<br>(d) Usage<br>(e) Profile                                     | Necessary for our legitimate interests (to develop our products/services and grow our business)                                                                                                                                                                                           |

## 7 Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

### 8 Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us and you have not opted out of receiving that marketing.

### 9 Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside Balmoral Group Holdings Limited for marketing purposes.

### 10 Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting us at any time.

### 11 Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy.

### 12 Change of purpose



We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

### **13 Disclosures of your personal data**

We may have to share your personal data with the parties set out below for the purposes set out above which include.

- Other companies in Balmoral Group Holdings Limited;
- External third parties:
  - Internationally-based service providers acting as processors who provide IT and system administration services.
  - Professional advisers including lawyers, bankers, auditors and insurers.
  - HM Revenue & Customs, regulators and other authorities; and
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.]

### **14 International transfers**

We share your personal data within Balmoral Group Holdings Limited. This may involve transferring your data outside the European Economic Area (EEA).

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring legally recognised safeguards are in place.

### **15 Data security**

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

### **16 Data retention**

#### **How long will you use my personal data for?**

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances you can ask us to delete your data. See below under your Legal Rights.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

### **17 Your legal rights**

You have the right to:

**Request access to your personal data** (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.



**Request correction of the personal data that we hold about you.** This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

**Request erasure of your personal data.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**Object to processing of your personal data** where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

**Request restriction of processing of your personal data.** This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**Request the transfer of your personal data to you or to a third party.** We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

**Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us.

**No fee usually required.** You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

**What we may need from you.** We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who does not have the right to it. We may also contact you to ask you for further information in relation to your request to speed up our response.

**Time limit to respond.** We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. By continuing to browse the site, you are agreeing to our use of cookies.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer's hard drive.

We use the following cookies:

**Strictly necessary cookies.** These are cookies that are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website, use a shopping cart or make use of e-billing services.

**Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our website when they are using it. This helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily.

**Functionality cookies.** These are used to recognise you when you return to our website. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).

You can find more information about the individual cookies we use and the purposes for which we use them in the table below:

| Cookie           | Name  | Purpose                                                                                                                                                                                             | More information                                                                                                                    |
|------------------|-------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| Google Analytics | _utmb | This site uses Google Analytics, a web analytics service provided by Google, Inc. Google Analytics sets a cookie in order to evaluate your use of our website and compile reports on user activity. | This is a third-party cookie and is set by Google - Click here for more information (https://developers.google.com/analytics/usage) |
|                  | _utmz |                                                                                                                                                                                                     |                                                                                                                                     |
|                  | _utmc |                                                                                                                                                                                                     |                                                                                                                                     |
|                  | _utmt |                                                                                                                                                                                                     |                                                                                                                                     |
|                  | _utma |                                                                                                                                                                                                     |                                                                                                                                     |



| Cookie           | Name                             | Purpose                                                                                                                                                                                                                                               | More information                                                                                                                                                                                          |
|------------------|----------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Google Translate | googtrans                        | This cookie stores language preferences for the Google Translate widget.                                                                                                                                                                              | This is a third-party cookie and is set by Google – Click here for more information ( <a href="https://policies.google.com/terms?gl=US&amp;hl=en">https://policies.google.com/terms?gl=US&amp;hl=en</a> ) |
| Session          | fc9160d764e60e482c43522d5a167893 | This cookie is essential for use of the website. It creates an anonymous "session" that allows the website to respond to your requests. This cookie is deleted when you close your browser and is not used to identify individuals using the Website. |                                                                                                                                                                                                           |

Please note that third parties (including, for example, advertising networks and providers of external services like web traffic analysis services) may also use cookies, over which we have no control. These cookies are likely to be analytical/performance cookies or targeting cookies.

You block cookies by activating the setting on your browser that allows you to refuse the setting of all or some cookies. However, if you use your browser settings to block all cookies (including essential cookies) you may not be able to access all or parts of our site.

Except for essential cookies, all cookies will expire in accord with the information available using the links above.

## MODERN SLAVERY STATEMENT

### Who we are

Balmoral Group Holdings Limited (BGHL) is a privately owned company, that last year, comprised of four manufacturing subsidiaries and one property owning subsidiary, Balmoral Park Limited. The four manufacturing companies are:

- Balmoral Comtec Limited; based in Aberdeen, Scotland is dedicated to technologically driven composite and polymer manufactured solutions. The company is focused on key market differentiators that include innovation, technical expertise and manufacturing efficiency as well as offering a comprehensive product portfolio. Its products are widely used across oil and gas and renewable energy markets. Balmoral Comtec also incorporates two offsite locations. Balmoral Newcastle based in North Shields Tyne & Wear, supports Comtec's demand for high quality rotational moulding tools, steel fabrication and machining requirements. Balmoral Montrose based in Montrose Port Angus, provides large scale composite structures for subsea applications.
- Balmoral Tanks Limited; based in Llantrisant, Wales and Thurnscoe, England offer turnkey packages that include tank design, manufacturing, civils groundwork, installation, mechanical, commissioning and after sales services..
- Water Environmental Treatment Ltd; based in Tamworth, England is a well-established Legionella compliance and water treatment company managing thousands of sites throughout the UK under one mission: "To provide our clients with a business sensible and reliably simple approach to water system management".
- Blaze Manufacturing Solutions Ltd; based in Laurencekirk, Aberdeenshire, designs & manufactures fire safety protection, detection and loss prevention solutions for the oil and gas, renewable energy, mining, nuclear, commercial and industrial sectors.

### Our responsibilities

We continue to take our social responsibilities very seriously and conduct our business in accordance with our core values of respect, integrity, accountability, innovation, motivation, and customer focus. As a company we are committed to understanding more about modern slavery and improving our practices to ensure that slavery and human trafficking are not present in any area of our business or supply chain.

We pride ourselves in acting ethically and with integrity in all our business dealings and relationships and expect the same ambitious standards from our contractors, suppliers, customers, and other business partners.

### Our commitments

We are continually committed to the following actions:

- Creating a safe working environment for everyone working at our facilities



- Upholding the principles defined by the United Nations Universal Declaration of Human Rights (<https://www.un.org/en/about-us/universal-declaration-of-human-rights>)
- Creating a safe working environment for everyone working at our facilities
- Upholding the principles defined by the United Nations Universal Declaration of Human Rights Universal Declaration of Human Rights | United Nations
- Adhering to the labour laws of all countries in which it operates
- Being available to hear and act regarding all legitimate employment-related concerns
- Providing adequate welfare facilities as and when required
- Ensuring that modern slavery or human trafficking is not present in the company's supply chains

## Review of our supply chain

As end-to-end solutions partner for many markets a sizeable proportion of the group's supply chain includes large multi-nationals involved in the supply of bulk raw materials. UK-based suppliers form a large part of the remainder of the supply chain.

The Group continually evaluate how to identify and address risks in each category of our supply chain, including those related to modern slavery and human trafficking. To map and mitigate risk, we use a variety of methods which allow us to undertake due diligence on our suppliers and ensure that we have appropriate policies and contractual terms in place, so that our suppliers understand the standards that we require of them. To the extent that our suppliers do not adhere to our standards, there can be material consequences, including the termination of our relationship with them.

We have done this by undertaking the following actions:

- Continuing to work with our supply chain to form contractual partnerships which encourage transparency of any potential risks in relation to modern slavery
- Continue to improve on our assessment of our critical members of our supply chain to identify any potential risks to their business and ours including modern slavery
- Continued review and assessment of our current supplier base
- Implemented an online learning portal for all relevant personnel within the Group in corporate governance including Modern Slavery

## Our vision

We have a goal to help eradicate all forms of modern slavery and human trafficking and passionately believe that the responsibility for this lies with us all. To achieve this goal, we will:

- Utilise regulatory authorities such as UK Government, Chartered Institute of Procurement and Supply (CIPS), Stronger2Gether checklists to ensure our Modern Slavery questions on our Vendor Assessment Questionnaire (VAQ) are relevant and current
- Continue to develop our knowledge and provide staff training to the Group relating to the Modern Slavery Act 2015
- Continue to foster long term relationships with our suppliers, through which policies aimed at minimising a range of risks can be developed
- Visiting, where possible, all our critical suppliers to allow us to better assess our supplier's commitment to removing slavery and human trafficking
- Maintain our Approved Vendor List to ensure our supply chain is also committed to removing slavery and human trafficking
- Continue to review and, where identified, improve our current procedures and policies
- Implement all current practices throughout the Group and any future companies who come under the control of Balmoral Group Holdings Limited.

This statement relates to all the above companies pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the Group's slavery and human trafficking statement for the fiscal year to 31 March 2023. It has been approved by BGHL board of directors and shall be reviewed annually.

### Kevin Binnie

Corporate Director

30 September 2023

### Balmoral Group

Balmoral Park, Aberdeen AB12 3GY, Scotland

Contact us | Locations (/contact)

Reg No. SC277480



