

SCOTSMAN HOLDINGS PLC

MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Introduction

This statement is made pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that slavery and human trafficking is not taking place in our supply chains or in any part of our business. This statement applies to the financial year ending 31 March 2023.

Our Commitment

We are committed to preventing modern slavery and human trafficking from occurring in our supply chains or in any part of our business. To this end, we implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or wider supply chains.

Despite renewed focus from global law enforcement, slavery and human trafficking largely remains a hidden problem. We all have a responsibility to be alert to the risks, however small, in our business and in wider supply chains. Staff are expected to report concerns and management are expected to act on them. The group is committed to supporting all staff who raise and act on genuine concerns in relation to modern slavery.

Our Business

Scotsman Holdings plc and its subsidiary companies operate exclusively in Scotland. Our operations are largely focussed in the leisure and hospitality sector (for instance, operating bars, restaurants, nightclubs, cinemas, hotels and serviced apartments). We also have interests in the property development and investment sectors and in the retail sector. The group has an annual turnover in excess of £36m.

Our Supply Chain

Our most significant supply chains involve the supply of food and drink products and the supply of construction materials and services. Other supply chains include the supply of technology, utilities, print and marketing materials, vehicles, building supplies and other goods, materials and services required to run our operations and service our properties.

The vast majority of our staff are employed directly by us but we occasionally obtain temporary cover from agency staff (for instance, to cover one-off large events or periods of staff illness). We also engage self-employed contractors, including DJs, event promoters and construction tradesmen.

All of our key suppliers and the vast majority of our other suppliers are UK-based or have a significant business presence in the UK.

Due Diligence Process

As part of our work to ensure slavery and human trafficking is not taking place in our supply chains, we:

- 1 aim to place all key supply contracts with reputable UK-based businesses;

- 2 aim to place all other supply contracts with reputable businesses;
- 3 aim to include provisions within our supply contracts to the effect that suppliers will not engage in modern slavery or human trafficking or tolerate it within their own supply chains;
- 4 expect all suppliers to have suitable anti-slavery and human trafficking policies and processes and carry out suitable due diligence at least one level up on their respective supply chains;
- 5 make our expectations of business behaviour clear to suppliers;
- 6 verify that all directly-employed staff have a right to work in the UK and require agencies to ensure that all agency staff provided have a right to work in the UK;
- 7 have systems in place to encourage the reporting of concerns to senior management; and
- 8 investigate all concerns raised and take appropriate action, which may include terminating business relationships.

Compliance Monitoring

Over the course of financial year 2022/23, we have taken the following further steps to ensure that slavery and human trafficking is not taking place in our business:

- 1 carried out, at random, checks on the modern slavery statements of several of our major suppliers, to ensure they shared our values and commitment to the combatting of modern slavery and human trafficking;
- 2 held discussions at board level to ensure compliance with the Modern Slavery Act 2015; and
- 3 reviewed government guidance to ensure our continuing compliance, including awareness of trends and developments in the area.

Training

To ensure that staff understand the risks of modern slavery and human trafficking, we have briefed all company directors on the subject and provide training on risks and indicators of modern slavery and human trafficking to relevant members of staff (e.g. those responsible for recruitment/human resources and procurement from external suppliers). We also publicise our policy on modern slavery and human trafficking among the wider workforce (for instance, by inclusion in company newsletters, when appropriate).

This statement is approved by the board of directors of Scotsman Holdings plc.

Stephen McQuade
Finance Director

31 March 2023