Lowther Forestry Group Ltd.

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LOWTHER FORESTRY GROUP LTD
MODERN SLAVERY & HUMAN TRAFFICKING STATEMENT

Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Modern slavery is a crime and a violation of fundamental human rights.

Modern Slavery and Human Trafficking Statement

This statement is published in line with section 54 (1) of the Modern Slavery Act 2015. The statement is reviewed annually and sets out the steps LFG has taken to understand and minimise the potential of Modern Slavery, Human Trafficking risks and illegal working that could be connected to our business and supply chains.

This statement applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers.

The deprivation of one person's liberty by another to exploit them for personal or commercial gain is unacceptable. This statement together with our policies and operating procedures, confirm our 'zero tolerance' approach to Modern Slavery, illegal working and Human Trafficking within our own business and across our supply chain.

LFG Policies in Relation to the Modern Slavery Act 2015

- Equality, Diversity and Inclusion Policy
- Whistleblowing
- Work Related Violence

LFG are committed to implementing thorough systems and controls aimed at ensuring that Modern Slavery, Human Trafficking and illegal working is not taking place anywhere within our Organisation or that of our supply chain.

Processes, Risk Assessments and Measures taken to Prevent Modern Slavery and Human Trafficking within our Business and Supply Chain

An annual risk assessment is completed to identify the risk of Modern Slavery, Human Trafficking and illegal working within our business. The current risk assessment indicates that the risk level is low.

To safeguard compliance with the law on preventing illegal working (as set out in sections 15-25 of the Immigration, Asylum and Nationality Act 2006) all employees (including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, contractors and suppliers) undergo thorough right to work checks prior to employment. Documents used to verify the right to work of individuals must be compliant with the Home Office Guidance "Comprehensive Guidance for Employers on Preventing Illegal Working". Copies of documents for direct employees are retained for at least 2 years after the individual has left the company. Periodic reviews for right to work of all workers is carried out as standard.

Our supply chains are primarily local or national. The LFG General Terms and Conditions Guidelines for Approved Suppliers details the minimum requirements and duties when working for LFG in relation to the identification of and prevention of modern slavery, human trafficking and illegal working.

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Our approach to due diligence within our supply chain includes:

- Strict onboarding processes and enquiries undertaken to validate that all new suppliers meet both legal and moral obligations in relation to the prevention of and reporting of Modern Slavery, Human Trafficking and illegal working.
- Regular reviews of all approved suppliers (max 3 years)
- Regular engagement and ongoing evaluation of all existing approved suppliers through auditing and meetings
- Regular communication with our supply chain detailing our expectations of business behavior.

Training

LFG is committed to ensuring that its employees are educated and fully understand their responsibilities with regards to the zero-tolerance approach to Modern Slavery, Human Trafficking and illegal working. LFG will provide awareness training to all staff on the Modern Slavery Act 2015 which will inform them of the appropriate action to take if they suspect a case of Modern Slavery, Human Trafficking or illegal working.

All staff that are involved in procurement activity will undertake additional Modern Slavery training units and will be made aware of the modern slavery procurement guidance as published on GOV.UK website.

Commitments

LFG operates an ethical and open approach to the way we do business. We recognise that we have a responsibility to take a robust approach to Modern Slavery, Human Trafficking and illegal working. Following the implementation of the Modern Slavery Act 2015, we are committed to maintaining and enforcing effective systems and controls to prevent Modern Slavery, human trafficking and illegal working within our corporate activities and that of our supply chain.

We understand that risks associated with Modern Slavery, Human Trafficking and illegal working will change over time. To mitigate risk, we will complete an annual risk assessment and carry out regular audits as minimum undertakings across our supply chain and implement suitable control measures. LFG will assess the effectiveness of all measures taken by using the following key performance indicators:

- Employee training completion
- Supply chain verification, review and monitoring
- Reports of Modern Slavery, Human Trafficking and illegal worker breaches, investigations undertaken, and remedial actions taken.

Responsibility for reporting incidents of slavery

The detection and reporting of slavery is the responsibility of all of us. You are encouraged to raise any concerns about any issue or suspicion of Modern Slavery, Human Trafficking or illegal working in any part of our business or supply chain at the earliest possible stage by one of the following means:

- Speak to your LFG line manager.
- Use the NSPCC Modern Slavery Helpline 0800 0121700

If you would like further information about the Modern Slavery Act 2015, the Immigration, Asylum & Nationality Act 2006 or labour standard breaches, please contact the NSPCC Modern Slavery Helpline 0800 0121700. In an emergency, please call 999.

This statement was approved by the Board of LFG and has been published on our website.

Signed: 

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Managing Director

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