



## The Modern Slavery Act 2015 Statement 2021

### Introduction

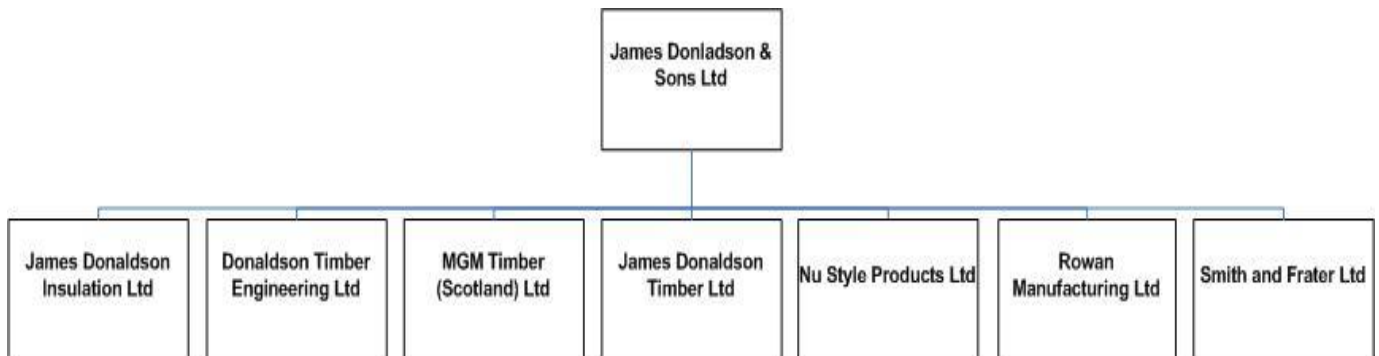
As a family owned business, James Donaldson & Sons Limited has a strong tradition of doing business in a responsible way, and we therefore acknowledge our responsibilities under the Modern Slavery Act 2015. We demonstrate our commitment to tackle Modern Slavery through our core values.



We put **customers**, service and quality at the core of everything we do.  
We conduct our business with absolute **integrity**.  
We empower our **people** with opportunities in a safe workplace.  
We deliver **sustainable** financial and environmental performance.  
We embrace the future through our proud **family** legacy.

This is our fourth annual review of our supply chain under the Modern Slavery requirements.

### Group Structure



### Compliance, Due Diligence and Audit

In accordance with the Timber Trade Federations Responsible Purchasing Policy (RPP) we have taken steps to ensure that all timber and timber products supplied are in accordance with EU Timber Regulations. PEFC and FSC standard certification schemes support international conventions to eliminate all forms of forced or compulsory labour, the abolition of child labour and the elimination of discrimination in respect of employment and occupation. We audit our product supply chain to ensure they meet the requirements for the chain of custody management systems on an annual basis.

A Supplier/country risk assessment was carried out in February 2021.



## Risk Assessment

We have reviewed the country of source for all suppliers from our 2020 statement and identified any new suppliers, new products or new supply routes. The number of suppliers has increased by 115 year on year but this is mainly due to adding Rowan Manufacturing and Smith and Frater to the group of companies.

We also updated all suppliers against the 2018 Global Slavery Index and Corruption Perceptions Index 2020, which identifies the level of risk in each business. The risk level is set out as follows:

Group Company	Medium/High Risk	Low Risk	Total
James Donaldson & Sons Limited (Group HQ)	6	2	8
James Donaldson Timber Limited	17	59	76
Donaldson Timber Engineering Ltd	1	21	22
MGM Timber (Scotland) Limited	33	134	167
James Donaldson Insulation Limited	0	71	71
Nu-style Products Limited	16	28	44
Rowan Manufacturing	21	60	81
Smith and Frater	3	14	17
<b>Total</b>	<b>97</b>	<b>385</b>	<b>482</b>

## Compliance

- Suppliers sourcing material/stock from a high or medium risk country were issued with a questionnaire to complete. Medium/High risk country suppliers have been asked to provide supporting information confirming their compliance with anti-slavery and human trafficking legislation
- Warrants and Indemnities will be sought, where appropriate, to ensure that business is conducted in a manner that is consistent with our Anti-slavery and Human Trafficking Policy
- All Group Policies and Training Packs have been modified to confirm compliance with the Modern Slavery Act 2015 including Equal Opportunities, Training Policy, Recruitment Manual and Standard Training Pack
- Company internal auditing processes have been updated to monitor compliance through the supply chain at each site and throughout each company in conjunction with our RPP and chain of custody standards
- A Supplier/country risk assessment will be carried out in February each year.

## Supplier Submissions

Following the risk assessments, 97 compliance questionnaires were received and supporting information provided by suppliers. All returned compliance information is held within the Group IMS Department.

## Customer Requests

This document is available from all company websites and is also published on [modernsalveryregistry.org](http://modernsalveryregistry.org).



## Our Commitment

We will not support or deal with any business knowingly involved in slavery or human trafficking and will carry out an annual risk assessment and audit within our supply chain. We will raise awareness by training our employees within the James Donaldson and Sons Limited Group companies to ensure that we comply with and promote this act in line with current legislation.

We will report annually on the steps we have put in place to combat modern slavery and human trafficking through our company website.

A handwritten signature in blue ink, appearing to read 'Andrew Donaldson'.

Andrew Donaldson  
**CEO**  
James Donaldson & Sons Limited

Date: 1<sup>st</sup> April 2021