



MODERN SLAVERY ACT STATEMENT

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 (“**MODSA**”) and sets out the steps that J. & J. Denholm Limited and its subsidiaries (together “**Denholm**”) have taken to ensure that slavery and human trafficking is not taking place in any part of its businesses or supply chains.

Denholm’s Businesses

Denholm is a 5th generation family business that comprises a group of companies operating across four divisions: Shipping; Logistics; Seafoods and Industrial Services. Denholm employs over 1,000 people across the United Kingdom and the Republic of Ireland.

This statement is made on behalf of the following entities:

- J. & J. Denholm Limited;
- Denholm Seafoods Group Limited;
- Denholm Seafoods Limited;
- Denholm Fishselling Limited;
- Rowantree Fishing Company Limited;
- Demarus Fishing Company Limited;
- Denholm Shipping Company Limited;
- Denholm Coates & Co Limited;
- Mountpark Shipping Company Limited;
- Denholm Logistics Group Limited;
- Denholm Global Logistics Limited;
- Denholm UK Logistics Limited;
- Denholm Port Services Limited;
- Lacy & Middlemiss Shipbrokers Limited;
- Hamilton Shipping (Port Services) Limited;
- Scruttons (NI) Limited;
- Hamilton Shipping (Container Services) Limited;
- Denholm Industrial Group Limited;
- Elite Scaffolding (South West) Limited;
- Scaffold Erection Services Limited;
- Denholm Industrial Services (Holdings) Limited;
- Denholm Industrial Services Limited; and
- Access Lifting Pulling & Safety Limited.

The Denholm Standard

Denholm prides itself on running its businesses to a high standard of ethical conduct and social responsibility. It is committed to ensuring that there is no modern slavery or human trafficking in its supply chains or in any part of its businesses.

At the centre of this ethos is Denholm's ethics policy – The Denholm Standard – which reflects its commitment to acting ethically and with integrity in all its business relationships. This policy is based around four principles:

- Upholding the law
- Integrity
- Fairness
- Respect

Under the Respect principle, Denholm is committed to respecting the people it works with and to providing a healthy, safe and satisfying environment for its staff to work in, which is free from harassment and discrimination. The Fairness principle dictates that all staff are treated fairly, and the Upholding the Law Principle dictates that Denholm complies with all applicable laws and regulations, including MODSA.

Denholm's Policies on Slavery and Human Trafficking

Denholm is committed to ensuring that neither it nor its supply chain is involved in slavery or human trafficking. Denholm continuously review and update its policies and procedures to ensure they are up to date, relevant and adhered to. Central to these policies and procedures is the Denholm Standard and Denholm's Supplier Code of Conduct.

Supply Chains and Risk Assessments

In 2016 Denholm developed a Supplier Code of Conduct and began circulating this to all suppliers in 2017. The Supplier Code of Conduct includes a section on human rights requiring that each supplier must:

- Conduct operations in a manner that is free from harassment and discrimination.
- Comply with all applicable minimum wage and working hours regulations.
- Recognise the principle of freedom of association and the right to collective bargaining.
- Not be involved in slavery (use of forced, bonded or compulsory labour).
- Not use child labour.
- Ensure that its operations are not involved in human trafficking.
- Have policies and procedures in place, aimed at ensuring that slavery, human trafficking and child labour are not present within its supply chains.

Each supplier is sent the Denholm Supplier Code of Conduct with an express instruction that they must comply with it if they wish to do business with Denholm. If they decline to do so they are removed from the approved supplier list.

Denholm updates its modern slavery risk assessment annually and where it is perceived that there is a higher risk of slavery, human trafficking or child labour in a particular supply chain, they are required to complete a questionnaire which has been developed alongside the Supplier Code of Conduct, to provide additional clarity and comfort in ensuring compliance with the Supplier Code of Conduct. A supplier who is requested to complete the additional questionnaire and either fails to do so or gives responses that do not satisfy Denholm's requirements is removed from the approved supplier list.



Denholm's internal audit function assesses compliance with its procedures to prevent modern slavery within its supply chain when undertaking an internal audit.

Training

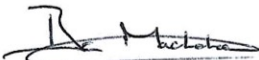
To enhance awareness and understanding of slavery and human trafficking at a high level within Denholm, senior management teams across all four divisions have participated in face-to-face training sessions prepared and delivered by its external solicitors. The senior management teams have addressed the importance of following Denholm's policies and procedures with their respective teams. Denholm are continually reviewing its training programme and within the next 12 months Denholm will be widening the training on slavery and human trafficking to more employees across the businesses through an online training course. Completion of this training course will be mandatory for all employees involved in the selection, management and payment of suppliers.

To ensure that Denholm's people fully embrace its culture, and that they strive to protect the dignity of its people and anyone who has dealings with the business, employees are required to confirm their compliance with The Denholm Standard annually.

Board Approval

The board of directors of J. & J. Denholm Limited approved this statement at its meeting of 18 June 2021 and this is Denholm's statement for the financial year ended 31 December 2020.

Signed for and on behalf of J. & J. Denholm Limited



Ben MacLehose
Chief Executive Officer

