

Scot JCB (Holdings) Limited

Scot JCB Limited

Stewart Plant Sales Limited

Scot Industrial Air

Kelso and Lothian Harvesters

A M Phillip Agritech

MODERN SLAVERY AND HUMAN TRAFFICKING POLICY

Scot JCB (Holdings) Limited (hereafter referred to as the Company) is committed to driving out acts of modern day slavery and human trafficking within its business and that from within its supply chains, including sub-contractors, and partners.

The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation. These as well as the suppliers of services make up the supply chain within the Company.

As part of the company's due diligence processes into slavery and human trafficking the supplier approval process will incorporate a review of the controls undertaken by the supplier. Imported goods from sources from outside the UK and EU are potentially more at risk for slavery/human trafficking issues. The level of management control required for these sources will be continually monitored.

The company will not support or deal with any business knowingly involved in slavery or human trafficking.

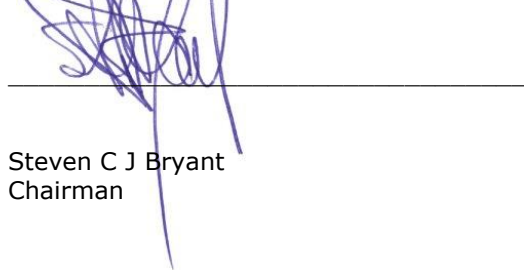
The company Directors and senior management shall take responsibility for implementing this policy statement and its objectives and shall provide adequate resources (training, etc) and investment to ensure that slavery and human trafficking is not taking place within the organisation and within its supply chains.

A full copy of this policy and a copy of the Modern Slavery Act 2015 will be accessible to all employees electronically via the Company Intranet and can be obtained from the HR department upon request.

This policy statement will be reviewed annually and published.

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System. The implementation and operation of this management system underlines our commitment to this policy. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated to all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

Signed on behalf of Scot JCB (Holdings) Ltd:



Steven C J Bryant
Chairman

Last Reviewed: January 2019 Next Review: January 2020