



Modern slavery Policy

Organisation

This policy applies to Mill of Benholm Enterprise (referred to in this statement as ‘the Organisation’). The information included in the statement refers to the financial year 2023

Organisational structure

MoBE is a two tier SCIO with currently no employees or offices. MoBE is controlled by the board of trustees and relies on volunteers from the community

MoBE is only active locally within the community of Mearns and Kincardinshire, Scotland

MoBE’s objective is to rescue and re-instate the Mill of Benholm and open it again for the community and visitors, as well as promoting the entirety of the conservation area of Benholm relying solely on volunteers from the local community

MoBE is committed to use local companies where possible.

Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in

Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to products our local suppliers or contractors are using. MoBE will always request the relevant information of the supply chains our suppliers and contractors are using in order to comply with our Modern Slavery Statement.

Potential exposure

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in potential undisclosed areas within the supply chains of our suppliers and contractors.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, MoBE has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

Impact of COVID-19

During the reporting period covered by this statement, the COVID-19 pandemic had taken hold. For several months, the UK was placed into lockdown to stem the spread of COVID-19. This created several challenges for the Organisation, as it did for others across the nation.

The Organisation welcomes the UK Government's decision, as confirmed in April 2020, to allow for a delay of up to 6 months in the publication of modern slavery statements without the risk of facing penalty.

Despite the permitted, delay, the Organisation remains in a position to publish its statement for the financial year 2023 in line with the original publishing requirements.

The Organisation concludes that the COVID-19 pandemic did/did not adjust the risk of modern slavery to a level above that which existed before the pandemic, which is as set out under 'POTENTIAL EXPOSURE' above.

During the pandemic, the Organisation's volunteers still had access to the grievance procedure to raise any concerns that they may have had.

The Organisation's modern slavery risks were subject to the same monitoring procedures during the pandemic as at all other times.

Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken the following steps to ensure that modern slavery is not taking place:

- REVIEWING YOUR SUPPLIER CONTRACTS TO INCLUDE TERMINATION POWERS IN THE EVENT THAT THE SUPPLIER IS, OR IS SUSPECTED, TO BE INVOLVED IN MODERN SLAVERY

- MEASURES IN PLACE TO IDENTIFY AND ASSESS THE POTENTIAL RISKS IN ITS SUPPLY CHAINS
- UNDERTAKING IMPACT ASSESSMENTS OF ITS SERVICES UPON POTENTIAL INSTANCES OF SLAVERY
- ANY ACTIONS TAKEN TO EMBED A ZERO-TOLERANCE POLICY TOWARDS MODERN SLAVERY

Key performance indicators

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

MoBE will always thoroughly check its supply chains to identify risk areas and avoid supply chains from said areas.

Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation’s obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Document Version Control

Modern Slavery Policy

Version number	Change or update	Author or owner	Date	Signed
1.0	First version	Secretary	January 23	E. Pollock 13/01/23

