

## 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 2024/2025.

### Organisational structure

The Mill of Benholm Enterprise is a two-tier SCIO with currently no employees or offices. The Mill of Benholm Enterprise is controlled by the Board of Trustees and relies on volunteers from the community

The Mill of Benholm Enterprise is only active locally within the community of Mearns and Kincardineshire within the area of Aberdeenshire Council, Scotland

The Mill of Benholm Enterprise'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, to safeguard this Category A listed Mill complex for generations to come and to manage the Mill of Benholm as a sustainable Visitor Centre and Community Hub.

The Mill of Benholm Enterprise is committed to use local companies and local products 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 of 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. The Mill of Benholm Enterprise 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, the Mill of Benholm Enterprise 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.

### **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.

The Mill of Benholm Enterprise 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

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