



# Modern Slavery Policy

## Introduction

This statement covers the activities of Dron & Dickson Group Ltd.

Dron & Dickson Group Ltd has a zero-tolerance approach to modern slavery. We pride ourselves on our reputation for acting fairly and ethically wherever we do business. Our reputation is built on our values as a company, the values of our employees and our collective commitment to acting with integrity throughout our organisation and supply chain. We are committed to ensuring that child labour, modern slavery and human trafficking does not take place anywhere within Dron & Dickson’s businesses or in any of its supply chain. We strive to meet our obligations under the Modern Slavery Act 2015, and we expect our contractors, suppliers and business partners alike to adhere to the same high standards.

## Our Purpose & Core Values

Our purpose **‘Everyone Home Safe’** – An encapsulation of the right for everyone to return from work safely and promote their wellbeing whilst at work; this applies to Dron & Dickson Group’s staff and all who come in to contact with our work activities. Our systems, processes and culture coupled with our supply and services ensures people, plant and the environment are kept safe.

Our Core Values, AGILE, aim to underpin and create a positive culture and working environment as well as set behavioural expectations. We are committed to investing in our workforce as we recognise people as our greatest asset.



## Organisational Structure

Dron & Dickson Group are recognised as leaders in the supply and maintenance of hazardous area electrical equipment. We offer a “one stop shop” for material supply (Wholesale Division) and engineering (Engineering Services Division), unique within the hazardous area market nationally and internationally.

Our organisation is currently based in the UK with a network of branches across England and Scotland. We currently have approximately 330 personnel engaged with our organisation which consists of a mixture of both employees & contractors. Headquartered in Stirling Scotland, Dron & Dickson Group has further branches located in Aberdeen,

Lowestoft, Hull and Runcorn alongside Cable Solutions Worldwide UK Ltd in Inverurie. In addition to our office-based employees, we have a number of site-based personnel who work in various locations worldwide.

### **Our Supply Chain**

Our supply chain includes the sourcing of material, equipment, labour and services to enable the organisation to service/supply the requirements of our clients within various industries worldwide. Dron & Dickson Group conduct thorough supplier reviews to ensure our suppliers continue to meet our high standards.

### **Our Policies on Slavery and Human Trafficking**

We are committed to ensuring our internal policies and the policies of our external providers prevent child labour, slavery and human trafficking occurring within their organisation. Our modern slavery policy reflects our commitment to acting fairly, ethically and with integrity in all our business relationships. In addition, we operate several additional internal processes and policies to ensure we continue to take the necessary steps to prevent slavery and human trafficking in our operations. These include:

- PL012 Ethics Policy
- PR043 Onshore Recruitment and Selection
- PR046 Technical Recruitment and Selection
- PR055 Control of Contractors
- PR019 New Supplier & Current Supplier Review
- PL027 Whistleblowing Policy

### **Due Diligence Process for Modern Slavery**

Our overall aim is to identify and assess potential risk areas and reduce the risk of slavery and human trafficking occurring whilst undertaking continuous review of potential risk areas in our business and supply chains.

### **Employment**

Dron & Dickson Group is committed to being a responsible employer, recognising the importance and advancement of Human Rights as an issue integral to our business, our operations and as employers.

We respect human rights standards for our workforce and as such ensure:

- the strict right to work and identity checks for all candidates who are offered employment.
- employees are free to choose to work for Dron & Dickson Group and to leave the company upon reasonable notice.
- all employees are provided with a clear contract of employment, which complies with local legislation.
- all employees are treated in a fair and equal manner and with dignity and respect.
- any form of discrimination, victimisation or harassment on any grounds is prohibited.
- appropriate procedures are in place to mitigate the risk of potential breaches of international human rights standards, including the United Nations' Universal Declaration of Human Rights (UDHR), the International Labour Organisation (ILO) core conventions on Labour Rights, and the Modern Slavery Act.
- all applicable laws and industry standards on employee wages, benefits, working hours and minimum age is adhered to in all countries of operation, without any unauthorised deductions.
- we observe the provisions for young workers such that any young persons under 18 should not be employed to work at night or for any hazardous work and their employment should not harm the young person's education, health or physical, mental, moral or social development.
- no young persons may be employed below the age of 16.
- all employees have the right to a safe working environment
- all employees have the right to appropriate level of absence from work i.e. annual leave.

Should non-compliance occur, the necessary steps will be taken to ensure that this is managed accordingly. Steps may range from additional training on specific subjects through to disciplinary measures if the behaviours and actions are deemed to be serious or wilful.

### **Supply Chain**

As part of our commitment to identify and eradicate slavery and human trafficking within our supply chain, we undertake several steps regarding the due diligence of our supply chains to ensure we meet our compliance and legislative obligations. Our due diligence process includes:

- Operating a strict procurement process, requiring suppliers to comply with all applicable laws and standards, including those which relate to the Modern Slavery Act;
- Expect our suppliers to evidence that they have suitable policies and processes in place within their own organisations to prevent slavery and human trafficking and to cascade these policies to their own suppliers. FR084 HSEQ Questionnaire is used to validate the responses from within our Supply Chain;
- Undertake a continuous review of assurance information from existing suppliers and follow up where relevant whilst reserving the right for Dron & Dickson Group to audit this information as we see fit.
- Invoking sanctions against suppliers that fail to improve their performance in line with an action plan or if in serious violation of our policy, including the termination of the business relationship.

### **Reporting Procedures**

Dron & Dickson Group have clear procedures in place for employees to raise concerns or complaints about work issues. Dron & Dickson's commitment includes the provision of a clear approach to raising a grievance, communicated to all colleagues, and that all issues raised will be dealt fairly and consistently to avoid any claims of discrimination or unfair treatment. Investigations are fully managed, and all hearings held promptly. There is also a fully documented appeal process, with transparent steps in a fully documented Grievance Procedure easily available and accessible to all. Furthermore, our Whistleblowing Policy sets out our commitment to speaking up about serious concerns, detailing how any person working at or with Dron & Dickson Group, including those employed in our supply chain, can raise concerns or 'whistle blow' and the channels available to do so confidentially, responsibly and effectively and without fear of repercussions.

### **Risk Assessment**

Dron & Dickson's annual review concludes there are no activities within our organisation and our supply chain that are considered to be high risk of slavery or human trafficking. As part of our review, we have identified an opportunity for improvement to enhance our approach to how we assess and manage risk. This improvement will be implemented by the end of Q2 of this financial year.

### **Measuring Effectiveness**

In addition to the above noted reviews, Dron & Dickson review our effectiveness against set metrics to ensure we track and monitor the performance of our anti-slavery actions, and that of our suppliers and clients, annually.

### **Training**

All Dron & Dickson Group staff are expected to comply with all laws and act in accordance with local guidelines, regulations and acts. To ensure full compliance under the Modern Slavery Act, we provide regular training to all relevant members of staff to raise awareness of the issues surrounding modern slavery and what to do if they suspect that it is taking place within our supply. Modern slavery training is deemed as mandatory, and training must be undertaken by all employees of Dron & Dickson Group.



**Declaration**

This statement has been approved by the Board of Directors and is made in accordance to Section 54 of the Modern Slavery Act 2015 and constitutes Dron & Dickson Group Ltd's Modern Slavery statement for the financial year ending May 2024.

Signed 

Date: June 2024

**Group Managing Director**