

## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

This Leiths (Scotland) Ltd Group statement applies to all Companies within the Group.

### Introduction

Under The Modern Slavery Act 2015, Section 54, organisations with a turnover in excess of £36 million must produce a slavery and human trafficking statement setting out the steps an organisation has taken during the financial year to ensure that slavery and human trafficking is not taking place in any of its supply chains or in any part of its own business.

The statement should, as a minimum, set out the following:

- The organisation's structure, its business and its supply chains;  
The organisation's policies in relation to slavery and human trafficking.
- Its due diligence processes in relation to slavery and human trafficking in its business and supply chains.
- The parts of its business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.
- Its effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.
- The training related to slavery and human trafficking available to its staff.

### Our business, structure and supply chains

Leiths Group have extensive resources provided by 5 subsidiary companies throughout Scotland.

The subsidiary companies include Markon Ltd, Joss (Aberdeen) Ltd, Lawrie (Demolition) Ltd, A Ross and Sons, Leiths Natural Stone and a joint venture in Kishorn Port.

Overall management of the Group operations is in our Head Office in Aberdeen.

Resources include 14 Quarries, 7 Asphalt Plants and 9 Concrete Plants.

Operations across Scotland include Quarry Production; Civil Engineering and Surfacing, Road Planing and Marking, Traffic Management; Demolition; Asbestos Removal; Contract Crushing; Haulage; Plant Maintenance; Precast Concrete Manufacture; Specialist Natural Stone Products; Special Developments and UKAS accredited Technical Laboratories.

We categorise our suppliers as follows:

**Direct:** these are the suppliers of raw materials without which we could not produce our products and principally include: aggregates, bitumen cement, fuel (including electricity), admixtures and extenders.

**Indirect:** these are the suppliers and providers of goods, services and facilities which assist in the operation of our business and include: labour, haulage services, operating equipment and other operating services.

**Capital:** these are the suppliers of capital items which we purchase for our business, including: fixed and mobile plant, buildings and other operating machinery.

Due to the enlarged footprint in which the Leiths Group now operates, the areas from which it sources its goods and services has extended.

These are still predominantly from within the UK, but there is now an extended reach within Europe, China, India and South Africa. Some imported cementitious products and specialist capital items are still being sourced from Europe. Bitumen is purchased from Nynas in the UK.

## Our Policies

The Leiths Group is opposed to slavery and human trafficking wherever it might occur, and we have a number of policies in place to mitigate and manage the risk of such practices occurring in any of our businesses or our supply chain, irrespective of the jurisdiction in which they operate.

We manage our people openly, honestly and fairly and aim always to behave as a responsible employer, adopting values and standards designed to help guide our staff in their conduct and business relationships. We are committed to having a fully trained and competent workforce and actively promote vocational training for our employees.

We have a Corporate Social Responsibility Policy and Whistleblowing Policy, which are available to all employees and through which colleagues can raise any concerns.

Senior Management within the business are made aware of, and expected to comply with, our Anti-Bribery Policy, and compliance is reviewed regularly.

Our Policies and Codes of Conduct are designed to reduce the impact of our operations on our employees and on the communities in which we operate. To this end, we particularly encourage equal opportunity and a positive approach to Health & Safety and care for the environment; we see our policies in these areas as an integral part of our business activities. We also continue to actively engage with the communities in which we operate through local liaison committees and support for local events, community groups and sports teams.

## Our Due Diligence Process

We aim whenever possible to work with preferred suppliers, who we can trust and with whom we can communicate effectively, especially on new areas of law which they may not be familiar with. All key supplier relationships are reviewed regularly.

We have a Supplier Code of Conduct which sets out the standards we expect of all our suppliers and their suppliers. This is available to our suppliers via our purchasing procedures and is available on our website.

## Assessing and Managing the Risk

As noted above, the vast majority of our supply chain is within the UK.

We recognise that some areas pose more of a risk of modern-slavery-related activities than others. This year we are continuing to put in place processes to identify the risks which may exist in our supply chain.

We will try, wherever possible, to procure all our goods and services through our standard purchase terms which impose contractual obligations on suppliers to comply with modern slavery principles, and with all relevant laws. We constantly challenge ourselves to engage with all our internal and external stakeholders to raise awareness of modern slavery and human trafficking.

The Company will review, update and publish this Modern Slavery and Human Trafficking Statement annually.



Grant Milne  
CEO

**Leiths (Scotland) Ltd**  
**1<sup>st</sup> October 2025**