

IMS Index 1.06 Modern Slavery Act 2015 – SWL Group Slavery and Human Trafficking Statement

Introduction

Modern slavery is the illegal exploitation of people for personal or commercial gain. Modern slavery is a real problem for millions of people around the world, including many in developed countries, who are being kept and exploited in various forms of slavery. Every company is at risk of being involved in this crime through its own operations and its supply chain.

This statement sets out the SWL Group actions to understand all potential modern slavery risks related to our business, and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking our business and supply chains. This statement relates to actions and activities during the financial year 01 October 2024 to 30 September 2025.

The Modern Slavery Act 2015 defines modern slavery as “slavery, servitude and forced or compulsory labour” and “human trafficking”.

Under s2(1) of the Act, human trafficking is defined as “*arranging or facilitating the travel of another person with a view to exploiting that person*”.

Our Business

Scottish Woodlands Ltd is a leading UK forest management business providing services to our clients and customers via directly employed forest managers and a UK based contractor network. This statement covers the activities of all parts of our Group within the UK. This includes:

- Scottish Woodlands Ltd
- RTS Forestry

We have an integrated management system (IMS), accredited, and independently audited to ISO 9001 Quality, ISO 14001 Environment and ISO 45001 Occupational Health and Safety.

Independent assessment of international forestry management standards is promoted with standards set by Forest Stewardship Council (FSC) and Programme for the Endorsement of Forest Certification (PEFC).

We have also used our accreditation to ISO 26000 Corporate Social Responsibility as a guide to integrate social responsibility into our values and practices. As part of the Forestry Management Industry, the organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

We recognise the ILO indicators of forced labour, promoting understanding of these, both within our organisation and with all of those whom we engage. Our policies and procedures are set to both eliminate all instances of forced labour, and circumstances which could engender forced labour abuses.

Our Policy on Slavery & Human Trafficking

Scottish Woodlands is absolutely committed to preventing modern slavery or human trafficking throughout its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking.

Our Policies reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. We have the following policies which incorporate ethical standards for staff and our workers:

- Code of Conduct Bribery Fraud and Anti-Corruption Policy
- Working Together Policy and Procedure
- Equality, Diversity & Inclusion Policy and Procedure
- Whistleblowing Policy and Procedure
- Human Resources Manual
- Recruitment & Selection Guidelines

Prior to commencement of employment, all staff are made aware of the above policies & procedures. Our staff and workers reflect the principles within our policies.

We have robust pre-employment checks to ensure that potential employees have the right to work in the UK, identity confirmed and are joining the company of their own free will.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we have provided refresher e-learning training to our staff in 2024, this training is refreshed at regularly intervals. This training covers:

- educate staff on identifying signs of modern-day slavery
- give confidence to staff to speak up about it
- the importance of recognising modern slavery, and the different aspects of it.
- educates on the compliance with the Modern Slavery Act 2015
- what modern slavery is, and examples of different cases and scenarios
- the impact businesses can have in controlling and monitoring slavery.

In addition, to ensure all new employees into the Company receive this and other e-learning training modules, they are required to participate in a series of E-Learning courses at onboarding stage, that are reviewed regularly.

Our Supply Chain

We recognise that we have a responsibility to take a robust approach to the prevention of slavery and human trafficking in all our corporate activities. As such, we take a zero-tolerance approach to slavery and human trafficking and expect those in our supply chain and contractors to comply with our policies, procedures, and values.

We carry out due diligence on all of our major supply chain partners and take steps to ensure their compliance with the Act.

Our Compliance Department undertakes a programme of IMS internal audits and worksite inspections on behalf of the Company looking for any evidence of practices, acts or omissions which may indicate instances of human trafficking or modern slavery, investigating, reporting, and actioning these as appropriate.

Further steps

In 2026 we will continue with our program of formal training for all our staff, both in recognition of the indicators of modern slavery and the reporting and follow up processes.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our slavery and human trafficking statement for the financial year ending September 2025.

This statement has been approved by the organisation's board of directors/members, who will review and update it annually.



Ian Robinson
Managing Director
03/03/2026