Modern Slavery and Human Trafficking Statement

Financial Year Ending 31.12.2026

1. What this Statement Covers

Modern slavery and human trafficking remain serious violations of fundamental human rights and can occur in all sectors, including within domestic supply chains.

This statement sets out the steps taken by Highland Fuels ("the Company") during the financial year to prevent modern slavery and human trafficking within our business and supply chains.

2. Our Commitment

The Company is committed to preventing modern slavery, servitude, forced or compulsory labour, and human trafficking in all parts of our business and supply chains.

We are committed to acting ethically, responsibly, and with integrity in all business relationships, and to taking proportionate and risk-based steps to ensure that slavery and human trafficking are not taking place within our operations or those of our suppliers.

Our approach reflects the policy principles of the Human Trafficking and Exploitation (Scotland) Act 2015, including prevention, protection of victims, and partnership working.

3. Our Business and Supply Chains

The Company operates primarily within the United Kingdom. Our supply chains are predominantly UK-based and include suppliers and contractors providing goods and services necessary to support our operations.

We recognise that, while our supply chains are domestic, risks of exploitation can still arise and therefore require ongoing vigilance.

4. Governance and Responsibility

Overall responsibility for ensuring compliance with this statement rests with the Managing Director, with support from the Board of Directors and Senior Leadership Team.

Managers are responsible for ensuring compliance within their respective departments and supplier relationships, and for escalating any concerns relating to modern slavery or human trafficking.

This statement has been approved by the Board of Directors.

Document Name:	HFPL00002	Author:	Stephen Rhodes
Revision:	C4	Responsibility:	Managing Director
Date Approved:	25-02-2026	Department:	Corporate

5. Policies and Procedures

To support our commitment, we maintain and apply a range of relevant policies and procedures, including:

- Whistleblowing (Public Interest Disclosure) Policy
- Recruitment and Right to Work procedures and payroll audits
- Conduct & Standards Policy

These policies are reviewed periodically and communicated to employees as part of induction and ongoing engagement.

6. Risk Assessment and Due Diligence

We adopt a proportionate, risk-based approach to identifying and mitigating modern slavery risks. Our due diligence measures include:

- Assessing modern slavery risk during supplier onboarding
- Expecting suppliers and contractors to comply with applicable anti-slavery legislation
- Maintaining direct communication with key suppliers
- Reserving the right to request information relating to labour practices

Where potential risks are identified, we will take appropriate steps to seek assurance, require remedial action, or review the continuation of the business relationship.

7. Training and Awareness

All employees receive induction training covering the Company's policies, expected standards of conduct, and reporting mechanisms.

Management teams involved in recruitment, procurement, or supplier management are expected to remain alert to indicators of exploitation and to escalate concerns promptly.

8. Reporting Concerns

The Company encourages the reporting of any concerns relating to modern slavery or human trafficking.

Concerns may be raised internally through the Whistleblowing Policy, or externally via the UK Modern Slavery & Exploitation Helpline:

- **08000 121 700**

- www.modernslaveryhelpline.org

All reports are treated seriously and investigated appropriately.

9. Measuring Effectiveness

We monitor the effectiveness of our approach through:

- Right-to-work verification for all employees
- Oversight of recruitment and payroll practices
- Ongoing engagement with key suppliers
- Review of any reported concerns or incidents

We are committed to continuous improvement and will enhance our controls where necessary.

10. Approval

This statement is made in accordance with section 54 of the Modern Slavery Act 2015 and constitutes the Company's modern slavery and human trafficking statement for the financial year.

Approved by:

Name: Stephen Rhodes
Position: Managing Director
Date: 25/02/2026