



**GLEANER OILS LTD**  
**MODERN SLAVERY STATEMENT FOR FINANCIAL YEAR**  
**ENDED 30 JUNE 2018**

Issued pursuant to Section 54 of the Modern Slavery Act 2015

**Company Background**

1. Gleaner Oils Ltd has been trading for over 60 years. The foundation of our success is simple, we employ over 200 dedicated and committed staff based at local depots offering a local service, supplying quality products at competitive prices; characterised by a real commitment of understanding. Meeting, the needs and requirements of our customers, refuelling cities, towns and remote rural communities throughout Grampian, The Highlands, The Western Isles, Argyll and Bute and the Central Belt of Scotland and Ayrshire, with both oil and LP Gas.
2. In addition to our core fuel distribution activities, the Company also offers the following services:
  - a. Boiler Maintenance – Our Company prides itself in our team of local engineers who are OFTEC and Gas Safe registered, offering a high standard of service;
  - b. Lubricants – offering a wide range of Shell Lubricants and Greases;
  - c. Gleaner Retail Brand – the introduction of our own brand is viewed as an added service and commitment to the communities of rural Scotland where many major oil companies, for a number of reasons, have stopped renewing supply contracts with independently owned and operated filling stations.
3. The company ensures that the requirements of the Modern Slavery Act 2015 are brought to the attention of employees during internal audits. We utilise reputable recruitment agencies, from whom we obtain details of compliance with the Act through our requirement to confirm compliance annually.
4. Our Supply Chain consists mainly of the larger petrochemical companies who subscribe to the Modern Slavery Act 2015, and actively encourage their staff to ensure that modern slavery and human trafficking is not undertaken either within their own company or their suppliers.

**Our Policies And Procedures**

5. The Company has established policies for the monitoring and control of Modern Slavery and Human Trafficking and for ethical working practices, these principles are contained in the following Company Policy Documents:
  - a. Anti-Slavery and Human Trafficking Policy
  - b. Quality and Environmental Policy
  - c. Employee Handbook
6. The Company's HR-Recruitment procedure requires that we check a candidate's eligibility to work in the UK and should ensure that, were there any suspicions that an applicant was subject to any form of Slavery or Trafficking, such suspicions would be highlighted to the appropriate authorities.

## **Due Diligence Processes**

7. One of the requirements to retain accreditation to ISO 9001 is to ensure that we “vet” new suppliers for compliance with the laws of our country, and that we undertake a periodic review of all our suppliers to ensure that they are still compliant with such laws. To this end we request confirmation from them that they comply with the Modern Slavery Act 2015 and obtain copies of their Anti-Slavery and Human Trafficking Policy Statements.
8. We are developing a revised Supplier Compliance Questionnaire which will be used for future compliance checks which will include a requirement to confirm compliance with the Modern Slavery Act 2015.

## **Steps Taken To Assess And Manage Risks**

9. Having reviewed our Supply Chains we have identified that we are at least 2 levels removed from areas of potential Modern Slavery and Human Trafficking activities. The majority of our Suppliers also have supply chains which are subject to close scrutiny and we are confident that all our Suppliers are compliant with the Act.
10. Through constant review of our Suppliers, and occasional, ad hoc, audit of our Suppliers, we are confident that we are not at risk of dealing with any company who is involved in either Modern Slavery or Human Trafficking.

## **Training**

11. HR remains up to date with the Act and receives updates on the signs and indicators to be aware of to identify potential Modern Slavery and Human Trafficking activities and these will be shared with all Managers who recruit staff.
12. Through our programme of Internal Audit we remind employees of the need to be alert to Modern Slavery or Human Trafficking in any of our Suppliers or Customers. We reinforce the principles outlined in our Policy and reiterate the Company’s commitment to support anyone who highlights any suspicions in good faith, emphasising that no detrimental treatment will follow the raising of such concerns.

## **Our Effectiveness In Eliminating Modern Slavery**

13. We believe that our activity in this area is such that it dissuades our suppliers from engaging in or condoning Human Slavery or Human Trafficking by reinforcing the need for openness and honesty in their dealings with us. The possibility of an audit visit from the Company, where the actions taken by our Suppliers to remove any activity covered by the Act will be checked is, we believe, also a strong deterrent.

Signed on behalf of the board:

30 June 2018

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D Todd  
Managing Director