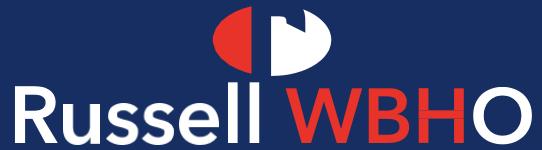


Slavery & Human Trafficking Policy Statement



We have a corporate ethos based on teamwork, integrity and loyalty. Fundamental to our business is a clear set of values, policies and procedures which apply to all our employees. We are committed to improving our procedures to combat slavery and human trafficking and all forms of coerced labour and exploitation. This statement sets out what we are doing to assess the risk of slavery and human trafficking and the steps we are taking to ensure it is not taking place within our business and that of our supply chain.

Organisation's Structure

Russells Limited and its group companies are private limited companies engaged in the construction and property sectors. We have circa one hundred employees and primarily operate within the UK. In 2018 Russells Limited merged with global construction firm WBHO an organisation whose morals, standards and values align with our own.

Our Supply Chains

We rely on our supply chains to support our business and deliver projects. It is therefore imperative that we nurture long standing relationships with our supply chains and operate with businesses that share our own values. New and existing suppliers/subcontractors are vetted and monitored through our supply chain management systems, are required to complete a detailed Pre-Qualification Questionnaire and also to provide evidence to show compliance with the Act. This process is reviewed regularly. The majority of suppliers operate within the UK but we do contract with others who operate in other jurisdictions. We have identified key risk areas including low paid and migrant labour and the sourcing of materials from jurisdictions where such labour may be used. Additional due diligence is undertaken for organisations operating within such areas of risk.

Our Policies on Slavery and Human Trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-slavery Policy reflects 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 operate a whistle blowing policy allowing employees to raise concerns in confidence.

Due Diligence

As part of our initiative to identify and mitigate risk we have or will be putting in place systems to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistleblowers.

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 provide training to our staff via our new employee induction and welcome pack and via regular updates.

Further Steps

We shall undertake annual review of the effectiveness of the steps we have taken to ensure that there is no slavery or human trafficking in our supply chains with a view to identifying further steps that we can take.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Russells Limited slavery and human trafficking statement.

The statement has been approved by the Board of Directors who take full responsibility for its implementation and will review and update it as necessary on an annual basis.

A handwritten signature in black ink, appearing to read 'Lee Downs'.

Lee Downs / March 2026

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