



# Russells Construction

## Slavery & Human Trafficking Policy Statement

We are committed to improving our procedures to combat slavery and human trafficking both within our own business and that of our supply chains. As part of our due diligence processes we shall make enquiries with all new suppliers as to the mechanisms they have in place to combat slavery and human trafficking and we will require all new suppliers to express their commitment to comply with the Modern Slavery Act 2015.

### 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 and fifty employees and primarily operate within the UK.

### Our Supply Chains

We have long standing relationships with our supply chains the majority of whom also operate within the UK but we do contract with suppliers from or whom operate in other jurisdictions. New & existing suppliers/sub-contractors are required to complete a detailed Pre-Qualification Questionnaire and also provide evidences to show compliance with the Act. This process is reviewed/repeated every 24 months.

### 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.

### 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 whistle blowers.

### 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.

### 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 will review and update it as necessary on an annual basis.

**Lee Downs / March 2019**