

Russell Group Modern Slavery and Human Trafficking Statement

April 2026

Introduction

Russell Group is dedicated to preventing modern slavery and human trafficking within our operations and supply chains, holding our suppliers to the same rigorous standards. This statement outlines the measures implemented by Russell Group to ensure such practices are not occurring.

Organisation's structure

Russell Group's main trading entities comprise John G Russell (Transport) Ltd, Carntyne Transport Co Ltd and Russell Railroad Ltd. The Group employs over 820 employees across 14 UK locations.

Our business

Russell Group is a Scottish based leading transport and logistics provider, committed to delivering high value solutions across the UK and Europe. The Group was formed in 1969 by Chairman John Russell, and consists of John G Russell (Transport) Ltd, Carntyne Transport Co Ltd and Russell Railroad Ltd. The Group offers a complete range of logistics services including domestic and international distribution by road, rail and sea, warehousing, on-site logistics, contract packing and e-fulfilment. With a network of strategically positioned depots providing nationwide reach, Russell Group leverages its resources, expertise, and experience to collaborate effectively with customers and take a proactive approach to supply chain management.

Our policies and Training

Russell Group is dedicated to preventing modern slavery and human trafficking across all aspects of its operations and supply chains, as reflected in its policies. Our internal guidelines promote conducting business in an ethical and transparent way, further reinforced through appropriate training initiatives where needed.

Whistleblowing policy

We encourage all colleagues, workers, customers, and business partners to raise any concerns regarding the activities of the business or supply chain, including potential risks of modern slavery or human trafficking. Our whistleblowing procedure is designed to facilitate the reporting of issues confidentially and without fear of retaliation. Concerns can be reported via the crime stoppers helpline or escalated directly to a company Director.

Anti-bribery and corruption policy

Russell Group strongly denounces all forms of bribery and corruption, which are wholly incompatible with the ethical standards and business practices upheld by our organisation. Such conduct directly contravenes our compliance policies. To ensure clarity and accountability, we have established a robust Anti-Bribery Policy that outlines the framework for preventing corrupt behaviour and provides comprehensive guidance on appropriate actions and adherence to ethical practices.

Anti-slavery and human trafficking policy

Russell Group is dedicated to conducting business ethically and with integrity in all relationships, implementing and enforcing effective systems and controls to prevent modern slavery and human trafficking throughout its operations and supply chains. This commitment is reflected in our policies, which apply to everyone working for or on behalf of the Russell Group, including employees at all levels, directors, officers, agency workers, contractors, consultants, third-party representatives, and business partners.

Modern slavery is a serious crime and a violation of fundamental human rights. It can take various forms, such as slavery, servitude, forced or compulsory labour, and human trafficking, all of which involve depriving individuals of their liberty for personal or commercial exploitation.

The Russell Group maintains a zero-tolerance approach to modern slavery. We are fully committed to ethical and transparent business practices, supported by robust systems and controls to ensure that modern slavery does not occur within our operations or supply chains. This commitment aligns with the transparency obligations outlined in the Modern Slavery Act 2015.

We expect the same high ethical standards from all contractors, suppliers, and business partners. As part of our procurement processes, we will implement specific prohibitions against the use of forced, compulsory, or trafficked labour, as well as slavery or servitude, whether involving adults or children. We also require our suppliers to enforce these same high standards throughout their own supply chains.

This policy applies to all individuals working with or for us in any capacity, including employees, directors, agency workers, contractors, volunteers, interns, consultants, agents, and third-party representatives. Please note that this policy does not form part of any employment contract and may be subject to updates or amendments at any time.

Responsibility for the policy

Russell Group has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Company has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.

You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Business Unit General Manager.

Compliance with the policy

It is essential that you read, understand, and adhere to this policy. The responsibility for preventing, detecting, and reporting modern slavery within any part of our business or supply chains lies with everyone working for or under our control.

You must avoid any actions that could lead to or indicate a breach of this policy. If you suspect or believe that a conflict with this policy has occurred or may arise, it is imperative that you notify your line manager or a company Director as soon as possible.

We encourage the early reporting of concerns related to modern slavery in any aspect of our business or supply chains, across all supplier tiers. If you believe or suspect that this policy has been breached, or that a breach may occur, report it promptly to your line manager, a company Director, or follow the procedures outlined in our Whistleblowing Policy.

Where appropriate, and prioritizing the welfare and safety of local workers, we will provide support and guidance to suppliers to help address coercive, abusive, and exploitative labour practices within their operations and supply chains.

If you are uncertain whether specific actions, general worker treatment, or working conditions within any supplier tier constitute modern slavery, please raise the matter with your line manager or company Director.

We value openness and pledge to support anyone who raises genuine concerns in good faith under this policy, even if those concerns turn out to be unfounded. Additionally, we are committed to ensuring that no individual experiences detrimental treatment for reporting suspicions of modern slavery in good faith.

Detrimental treatment includes dismissal, disciplinary actions, threats, or any unfavourable measures associated with raising a concern. If you believe you have been subjected to such treatment, inform your line manager immediately. Should the issue remain unresolved, employees may formally raise the matter through our Grievance Procedure.

Communication & awareness of this policy

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and updates will be provided using established methods of communication between the business and you.

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

Breaches of this policy

Employees found to be in breach of this policy will be subject to disciplinary measures, which may include dismissal for misconduct or gross misconduct. Similarly, we reserve the right to terminate our association with any individual or organization acting on our behalf if they fail to comply with this policy.

Due diligence processes for slavery and human trafficking

As part of our initiatives to identify and mitigate risk as a business:

- The Russell Group Anti-Slavery and Human Trafficking Policy was launched in 2017. This was communicated and cascaded to all employees across the Russell business and is accessible to all employees via our intranet, our Code of Conduct and also on the Company's website. The policy sets out commitments to ensuring that modern slavery and human trafficking are not taking place anywhere in the business or our supply chains and sets out an expectation of the same high standards from all contractors, suppliers and other business partners.
- Benchmarking is regularly performed against the Ethical Trading Initiative (ETI) base code to ensure that the business is acting in accordance with an internationally recognised code of practice.
- Russell Group are a member of SEDEX
- The standard terms and conditions for the purchase of goods and/or services require suppliers to comply with all applicable laws and regulations including, without limitation, those relating to anti-slavery and human trafficking including the Modern Slavery Act 2015 and those relating to anti-bribery and anti-corruption including the Bribery Act 2010, and relevant policies.
- We validate the identity of all employees and ensure that they have the legal right to work in the UK.
- We audit agency labour providers twice a year against the ETI base code to ensure ethical standards. Occasional spot checks are also performed on the temporary labour agencies and any non-conformances or concerns are followed up in a timely manner.
- Russell Group are a Corporate Partner of the Scotland Against Modern Slavery Movement.

Approval for this Policy

This statement was approved by the Board of Directors on 17/4/2026

Name (Director) **David Paterson CEO**

Signature

A handwritten signature in black ink, appearing to be 'D. Paterson', written over a circular stamp or mark.

'Russell Group' includes trading companies John G Russell (Transport) Ltd, Carntyne Transport Co Ltd and Russell Railroad Ltd.