

# Russell Group Modern Slavery and Human Trafficking Statement

May 2024

## **Introduction**

Russell Group is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains and imposes the same high standards on our suppliers. This statement also sets out the steps taken by Russell Group ensure that no such modern slavery or human trafficking is taking place.

## **Organisation's structure**

Russell Group's main trading entities comprise John G Russell (Transport) Ltd, Carntyne Transport Co Ltd and Rusell Railroad Ltd. The Group employs over 800 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 and Carntyne Transport Co 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 strategically located depots offering nationwide coverage, Russell Group has the resources, knowledge, and experience to work in partnership with customers to proactively manage the supply chain.

## **Our policies and Training**

Russell Group is committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chains and this is reflected in the company policies. Our internal policies ensure that we are conducting our business in an ethical and transparent manner, and we support this with relevant training where appropriate.

## **Whistleblowing policy**

All colleagues, workers, customers and other business partners are encouraged to report any concerns related to the activities of the business or supply chain. This includes any circumstances that may give rise to a risk of modern slavery or human trafficking. The whistleblowing procedure is designed to make it easy for disclosures to be made, without fear of retaliation. Employees, customers or others can use the crime stoppers helpline to report their concerns as well as escalation to a company Director.

## **Anti-bribery and corruption policy**

Russell Group condemns any form of bribery or corruption. Engaging in corrupt behaviour is not compatible with how our organisation conducts business and it is against our business compliance. This policy defines the framework and provides guidance on how to act accordingly.

## **Anti-slavery and human trafficking policy**

Russell Group is committed to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in the Russell group or any of our supply chains. The policy applies to all persons working for or on behalf of Russell group in any capacity, including employees at all levels, directors, officers, agency workers, contractors, external consultants, third-party representatives and business partners.

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

Russell Group has a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015.

We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, in the coming year we will include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and we may amend it 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**

You must ensure that you read, understand and comply with this policy. The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control.

You are required to avoid any activity that might lead to, or suggest, a breach of this policy. You must notify your line manager or a company Director as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage. If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your line manager or company Director or report it in accordance with our Whistleblowing Policy as soon as possible.

You should note that where appropriate, and with the welfare and safety of local workers as a priority, we will give support and guidance to our suppliers to help them address coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager or company Director.

We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.

Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment, you should inform your line manager immediately. If the matter is not remedied, and you are an employee, you should raise it formally using 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**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct. We may terminate our relationship with other individuals and organisations working on our behalf if they breach 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.

## Approval for this Policy

**This statement was approved by the Board of Directors on 20/05/2024**

Name (Director)      **Alan W Poulton    CEO**

Signature

A handwritten signature in black ink, appearing to read 'Alan W Poulton', written over a light blue horizontal line.

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