

1. PURPOSE

The purpose of this document is to outline the Company's procedures pursuant to Section 54 of the Modern Slavery Act 2015 and sets out the steps that the Company has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain.

Key risks – perpetuating and acquiescing slavery practices within RTT supply chain is injurious and prejudicial to stakeholders and staff both internally and within the greater supply chain as well as being damaging to RTT's reputation.

Key opportunities – in following a balanced, moral and lawful approach, RTT will reap the benefits of relying on an ethical supply chain which promotes fair practices.

2. SCOPE

Company: John A Russell (Joinery) Ltd T/A Russell Timber Technology, referred hereinafter as RTT or the Company.

Application: This policy applies to all departments of the business and governs both internal relations with employees as well as external relationships with supply chain providers.

3. OBJECTIVES

Modern slavery encompasses slavery, servitude, human trafficking, forced labour and child labour. Slavery & human trafficking (modern slavery) are crimes and a violation of human rights. The Company has a zero-tolerance approach to any form of modern slavery and will not tolerate the use of child or forced labour, nor the exploitation of children in any form in its operations or sites. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

4. RESPONSIBILITIES

This policy applies to all staff whether full-time, part-time or temporary employees, contractors or consultants who undertake activities that represent the Company and is available on the Company Website, IMS Manual, Employee Handbook and relevant interested parties on request. The Managing Director, Operations Director, Departmental Managers and Operations Support Administrator are collectively responsible for ensuring this policy is communicated to all employees, forms part of new staff induction and the following procedures practised.

5. PROCEDURES

INTERNAL PROCEDURES

We operate several internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

1. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
2. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business or supply chain, without fear of reprisals.
3. Training. We regularly conduct training for our procurement/buying teams so that they understand the signs of modern slavery and what to do if they suspect that it is taking place within our supply chain.

EXTERNAL PROCEDURES

Our suppliers

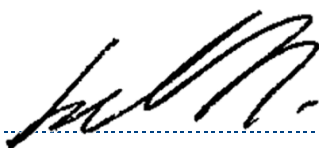
The Company operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that particular organisation has never been convicted of offences relating to modern slavery.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

1. They have taken steps to eradicate modern slavery within their business.
2. They hold their own suppliers to account over modern slavery.
3. In relation to UK based suppliers, they pay their employees at least the national minimum wage / national living wage (as appropriate).
4. In relation to overseas suppliers, they pay their employees any prevailing minimum wage applicable within their country of operations.

6. POLICY AUTHORISATION

Signature:



Date: 6th May 2022

John Russell
Managing Director