

RUSSELL CAWBERRY LTD

Our Commitment

The Company is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business.

We are committed to acting ethically and with integrity in all our business relationships and taking reasonable steps to ensure slavery and human trafficking are not taking place in any business or organisation that has any sort of a business relationship with our Company.

Due diligence processes for slavery and human trafficking

The Company has zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

As part of our initiative to identify and mitigate risk the Company has in place systems to encourage the reporting of concerns and the protection of whistle-blowers.

Our supply chain providers are always with a UK provider and we expect these entities to have suitable anti-slavery and human trafficking policies and processes.

Training

The management team are responsible for compliance within their respective departments and in their supplier relationships and have been trained accordingly.

All employees receive an induction into the business where our policies, procedures and expectations are outlined.

Our effectiveness in combating slavery and human trafficking

The Company uses the following key performance indicators to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains:

- Use of labour monitoring, right to work documentation and payroll audits
- We maintain a level of communication and personal contact with the next link in the supply chain to ensure their understanding of, and compliance with, our expectations.
- We regularly review supply chain policies, codes of conduct and our working practices to show commitment.

As an employer, Russell Cawberry Group are responsible for the health, safety and welfare of every person doing work for us and anyone who could be affected by that work, such as visitors or members of the public.

Russell Cawberry take account of the competence and needs of migrant workers before they start work by:

- Considering their [English language skills](#) and basic competencies (for example literacy, numeracy, physical attributes, general health, relevant work experience), including whether they are new to the job.

- Checking they have the qualifications and skills required before they start at the workplace, including whether their vocational qualifications are compatible with those in Great Britain.
- Checking the eligibility of working in UK, settlement status, passport etc.

Russell Cawberry recognises its responsibilities under the Modern Slavery Act 2015 and related Codes of Practice and ensures the following:

- The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains, whether in the UK or abroad, is the responsibility of all those working for Russell Cawberry or under the Company's control. Everyone in the company is required to avoid any activity that might lead to a breach of this policy.
- If we believe or suspect a breach of or conflict with this policy has occurred or may occur, every employee is encouraged and must notify line managers or report it in accordance with the Company's policy.
- You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of Russell Cawberry Group business or supply chains as soon as possible.
- If anyone is unsure about whether a particular act, the treatment of workers or their working conditions within any of the Company's supply chains constitutes any of the various forms of modern slavery, please raise it with your line manager.
- Everyone in the company can also contact the government's Modern Slavery Helpline on 0800 0121 700 for further information and guidance on modern slavery.
- Russell Cawberry aims 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. The Company is committed to ensuring no one suffers any detrimental treatment or victimisation as a result of reporting in good faith their suspicion that modern slavery is or may be taking place in any part of its business or in any of its supply chains.

All workers are entitled to the same level of health and safety protection irrespective of their immigration or employment status. Migrant workers may be employed as agency/temporary workers, working for employment agencies, employment businesses or gangmasters, which often means they are employed in non-standard work patterns.

As an employer, we assess what information, instruction and training each worker needs and ensure it's in place for when they start work.

Russell Cawberry managers deliver induction and give details on where, when and how it will be done.

In providing essential job-related training, you should:

- plan induction training carefully and deliver it with plain, simple language.
- provide information about the risks workers may be exposed to and the precautions they will need to take to avoid them, including how to use safety equipment.
- check workers fully understand the information and training they are given to ensure they can work safely and know how to raise health and safety concerns.

- ensure workers fully understand any emergency arrangements and procedures.
- ensure workers are adequately supervised and are able to communicate effectively with their supervisors.

Russell Cawberry Ltd. identifies any foreign workers and their nationalities before intended employment and verifies right to work documentation, any site staff is verified via 3rd parties (registered Employment Agencies) which are contracted to RCG to verify the legal status and right to work in UK, these documentations are also checked and verified on site induction where relevant.

Russell Cawberry Ltd ensures compliance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006 via 3rd parties and registered employment agencies ensuring all controls in place are applicable to all potential or current employees.

Documents used to verify right to work are compliant with the Home Office Guidance Comprehensive Guidance for Employers on Preventing Illegal Working are logged onto our system with reference numbers in order to highlight any renewal required and are retained for at least 2 years after the individual has left RC employment by the site office and is also maintained via 3rd parties and employment agencies for site operatives, these are being verified on site inductions including checks and controls of employment agency, self-employed, subcontracted personnel.

Russell Cawberry ensures that periodic reviews for right to work of all workers including agency temporary and seasonal employees takes place and are completed by the employment agencies where applicable.



**Pierce Ryan,
Managing Director
1st January 2026**