

## Anti-slavery & Human Trafficking Policy

### OUR BUSINESS

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Buccleuch is a diverse and innovative business with a passion for sustainable land use in rural Britain. People are at the heart of Buccleuch, in particular, colleagues, tenants, customers and visitors. Our commercial enterprises, including leisure & hospitality, agriculture, forestry, energy, rural estates and commercial property, provide approximately 500 jobs in local communities.

We have a diverse supply chain and are committed to ensuring that our business operations are free from involvement with slavery or human trafficking.

### POLICY

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#### Introduction

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes the modern slavery and human trafficking policy for The MDS Estates Ltd and all subsidiary companies (referred to here as "Buccleuch").

#### Policy objectives

At Buccleuch we have developed and published this policy to demonstrate our commitment to implementing effective systems to prevent modern slavery and human trafficking.

### POLICY STATEMENT

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Robust processes are in place to ensure that all our colleagues are paid at least the minimum statutory rates of pay and have the right to work in the UK. This includes an annual audit completed in April each year to ensure compliance with the National Minimum Wage and other specific wages bodies as applicable.

As a UK-based company with limited direct supply chains, we see most of our business as 'low risk' in relation to the threat of slavery and human trafficking offences being committed. However, where we identify a risk in relation to supply chains, we will carry out compliance audits on a regular basis.

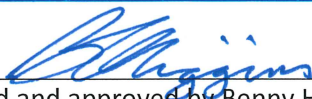
Restoration Yard Limited, one of our subsidiary businesses makes a significant number of purchases from a wide range of suppliers and therefore represents our highest supply chain risk. To mitigate any risks, current and new regular suppliers are assessed and audited on an annual basis, and any supplier who cannot provide assurance of their practice will no longer be used.

Slavery and human trafficking are considered and addressed in our approach to corporate social responsibility and any concerns can be raised either by contacting our HR team or via the whistleblowing procedure.

Training on this topic is provided to colleagues who are involved in the management of our supply chains.

Buccleuch will regularly review and develop this policy, a copy of which is available in the Buccleuch Handbook and on <https://www.buccleuch.com/>.

### APPROVAL



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This policy is signed and approved by Benny Higgins, Executive Chairman.

Signed:

Date: 09 May 2024