

Anti-slavery & Human Trafficking Policy

OUR BUSINESS

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

Introduction

This statement is made pursuant to section 54 of the Modern Slavery Act 2015 and sets out the steps taken by MDS Group Investments Ltd and all subsidiary companies (referred to here as “Buccleuch”) to prevent modern slavery and human trafficking in its business operations and supply chains.

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

Buccleuch is a UK-based business which operates across a variety of sectors including land management, agriculture, forestry, property and visitor attractions. 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.

We make a significant number of purchases from a wide range of suppliers to offer goods and services in our retail and hospitality offerings, and therefore this represents our highest supply chain risk. To mitigate any risks, current and new regular suppliers are required to confirm compliance with the Modern Slavery Act, provide information to allow them to be assessed and audited on an annual basis by a senior member of the management team, and any supplier who cannot provide information about, and assurance of their practice will no longer be used.

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. When those under the school leaving age are employed, for example, in weekend or seasonal work, this is in accordance with the relevant child labour laws and adhering to local authority regulations in relation to the application of work permits.

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/>. This statement replaces previous statements published under The MDS Estates Ltd, which no longer meets the reporting criteria.

APPROVAL

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

Signed:



Date: 26 May 2026