



In business to do business

Modern Slavery & Human Trafficking Statement

Introduction

This statement applies to RO Trading Limited. The information included in the statement refers to the financial year 31 March 2026.

This statement is published in accordance with the Modern Slavery Act 2015. It sets out the steps taken and action planned to prevent modern slavery and human trafficking in our businesses and supply chain.

About

RO Trading is a company with a history spanning more than 90 years. It operates solely within the UK and has three offices: the Head Office in Potters Bar, Hertfordshire, and additional offices in Farringdon, London, and Fair Oak, Hampshire. The company is overseen by a board of directors.

Based upon the founding principle that the company is 'In business to do business' this straightforward direct approach has seen it thrive over the years through careful engagement in a diverse range of interests, which continues to this day.

Presently the company works in the property sector through asset management, refurbishment and development, procurement of land for a variety of end uses, house building and also early-stage investing focusing on PropTech and CleanTech. As part of its social responsibility programme, it also provides substantial support to local community charitable projects and causes as well as providing opportunities for employees to be involved in a range of charitable initiatives.

The company places an important emphasis on integrity throughout its businesses and has a rigorous approach to health and safety and ethical business practices. This statement forms part of our commitment to ensure that there is no modern slavery or human trafficking in our supply chain or in any part of our business.

Definitions

The company considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

Commitment

The company acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The company understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.



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The company does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The company strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom and in many cases exceeds those minimums in relation to its employees.

Supply chain

Due to the nature of our operations, we engage with a large number of suppliers, manufacturers, consultants, contractors and sub-contractors. Our supply chain includes the engagement of contractor organisations to carry out works and services on our development sites and the sourcing of materials and manufactured products.

We have developed long-standing relationships with our suppliers, manufacturers, consultants, contractors and sub-contractors and make clear our expectations of business behaviour and our high level of standards expected.

We appoint principal contractors and expect that all materials used in our developments and refurbishments are procured from sources that have not been identified as being at risk from modern slavery and human trafficking. We strive to monitor the people we work with by utilising systems we have in place for media news and financial alerts and checks.

Policies and values

We have a number of policies and values which together address our commitment to eliminating the risk of modern slavery and human trafficking taking place within our businesses and in our supply chain, as well as ensuring we act ethically and with integrity in all our business relationships. This includes our policies and values on:

- Anti-bribery & Corruption
- Whistleblowing
- Equal Opportunities, covering:
 - Fixed-term Employees & Agency Workers
 - Recruitment & Selection
- Employee Handbook and Employee Promise
- Group Occupational Health and Safety Management System
- Sustainability Commitment

Employees

Our recruitment processes are reviewed regularly. We have procedures in place for the vetting of new employees and undertake references and checks to confirm their identities. Employees are paid directly into an appropriate, personal bank account. We have policies and procedures in place to ensure compliance with UK employment and human rights laws and all staff are remunerated fairly and above the UK's national living wage.

We encourage employees to report in good faith any issues or concerns they may have regarding unethical business practices.



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Performance Indicators for 2025 - 2026

In accordance with section 54(4) of the Modern Slavery Act 2015, we have taken the following steps to ensure that modern slavery is not taking place:

1. Monitoring and educating our staff and supply chain

All staff continue to be provided with annual online compulsory training which delivers information on the definition of modern slavery and human trafficking, practical examples of how slavery and/or human trafficking can take place within our businesses and our supply chains. Reinforcement of how to report any concerns of modern slavery and/or human trafficking is provided to all of our staff and supply chain periodically.

We will encourage our staff and anyone in our supply chain to report in good faith any issues or concerns they may have regarding unethical business practices.

2. Undertaking due diligence to ensure compliance

All supply chain members providing operational professional advice, or a product and service offering are required to be members of Constructionline, Vantify Risk Manager, Prosure 360 or other similarly recognised (SSIP) accreditation scheme; those undertaking Construction activities, as a Principal Contractor (under CDM) must be Bronze Constructionline accredited or better.

All accreditation schemes will provide questions that supplier members need to complete in order to comply with legislation, with questions that require full disclosure of their employees' eligibility to work in the UK including details of their action taken to eradicate slavery in their workforce, where appropriate.

4. Our approach to tackling the issue of modern slavery

If we identify anyone within our supply chain who are at a higher risk of unfair working practices, modern slavery or human trafficking, we will undertake a more in-depth assessment and require those suppliers, manufacturers, consultants, contractors and sub-contractors to complete a detailed self-assessment questionnaire.

At construction site level, we require Principal Contractors to actively promote the "Stronger2Gether" campaign: [Construction - Stronger Together](#)

We will continue to monitor the supply chain to assess the risk of slavery and human trafficking being present and develop measures to further mitigate against any such risk.

This statement is made in pursuance of s.54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

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