



JAMES WALKER
LEITH

Modern Slavery and Human Trafficking Statement – 2026

Introduction

Modern slavery and human trafficking are serious human rights abuses that affect individuals and communities across the world. Modern slavery includes forced or compulsory labour, slavery, servitude, debt bondage and human trafficking.

James Walker (Leith) Ltd and the businesses within the Group are committed to ensuring that modern slavery has no place in our operations, workplaces or supply chains. We recognise our responsibility to identify, assess and manage modern slavery risks and to promote ethical and responsible employment and procurement practices.

This statement is made in accordance with Section 54 of the Modern Slavery Act 2015 and sets out the steps taken by James Walker (Leith) Ltd and the businesses within the Group during the reporting year to prevent modern slavery and human trafficking within our business and supply chains.

James Walker Group

James Walker (Leith) Ltd is a UK holding company with businesses operating across construction, residential and commercial property development, timber manufacturing and importing, and healthcare facility management.

The Group comprises:

- Dundas Building Co. Ltd
- Dundas Estates and Development Co. Ltd
- Walker Commercial Properties Ltd
- Walker Healthcare Ltd
- Walker Residential Properties Ltd
- Walker Timber Engineering Ltd
- Woodbridge Timber Ltd

The Group is committed to operating with integrity and expects employees, suppliers, contractors and business partners to uphold appropriate standards of ethical conduct and respect for human rights.



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Our Policies

Our approach to preventing modern slavery is supported by a range of Group policies and procedures, including:

- Ethical Trading Code of Conduct and Human Rights
- Equal Opportunities
- Anti-Harassment and Bullying
- Anti- Corruption and Bribery
- Whistleblowing

These policies support our commitment to fair treatment, ethical business practices and respect for human rights. Policies are reviewed regularly and made available to employees through our internal systems and HR.

Our approach is informed by recognised international human rights principles, including the UN Guiding Principles on Business and Human Rights and the International Labour Organization's fundamental principles and rights at work.

Our Employees

All Group employees are employed under terms and conditions that comply with UK legislation.

Recruitment is undertaken through established recruitment channels and, where recruitment agencies are used, we expect them to operate responsibly and in accordance with applicable legislation. Appropriate right-to-work checks are undertaken for employees.

We are committed to fair, transparent and non-discriminatory recruitment and employment practices.

Employees are encouraged to raise concerns through management and established whistleblowing arrangements. Any concerns relating to modern slavery, forced labour, trafficking or exploitation will be taken seriously, investigated appropriately and escalated to senior management and, where necessary, the relevant authorities.

Supply Chain and Due diligence

We recognise that modern slavery risks may be greater within complex supply chains, particularly where there is reliance on subcontractors, labour agencies, temporary or migrant workers, international sourcing or lower-tier suppliers.



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Employees involved in supplier selection and onboarding are responsible for ensuring that appropriate due diligence is undertaken and that suppliers are reputable and suitable for engagement.

Our approach includes:

- assessing suppliers and contractors before engagement;
- considering ethical and human rights standards as part of supplier relationships;
- communicating our expectations regarding modern slavery and responsible employment practices;
- obtaining information from suppliers regarding their approach to managing modern slavery risks;
- maintaining appropriate oversight of higher-risk suppliers and supply chains;
- engaging with suppliers where potential concerns are identified; and
- taking appropriate action where serious or unresolved breaches are identified, which may include termination of the business relationship.

We recognise that effective due diligence is an ongoing process and requires continued engagement rather than a one-off assessment.

Key Areas of Risks

Given the sectors in which the Group operates, we recognise a number of areas where modern slavery risks may arise.

Construction and Property

The construction sector can present increased risks due to the use of subcontractors, labour agencies, temporary workers and complex supply chains.

Our focus is therefore on appropriate contractor and subcontractor due diligence, responsible labour sourcing and maintaining appropriate oversight of working conditions.

We will continue to review our contractor arrangements and strengthen due diligence where risks are identified.

Timber

Our timber businesses source products through international supply chains. Potential risks may arise within forestry, timber processing, manufacturing, logistics and transportation.

We seek to source timber from established suppliers and use recognised certification schemes, including FSC and PEFC, where applicable.

We will continue to assess geographic and supplier risks and improve visibility of relevant supply chains, including consideration of risks beyond our direct suppliers.

Healthcare

Healthcare operations may involve complex supply chains and outsourced services such as cleaning, catering, security and other facilities-related activities.



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We recognise that these areas can involve increased reliance on contractors, agency workers and lower-skilled labour and will continue to consider modern slavery risks when procuring goods and services and managing relevant suppliers and contractors.

Risk Assessment and Management

We take a risk-based approach to identifying and managing modern slavery risks, considering factors including:

- the sector and nature of the goods or services being procured;
- geographic location;
- the use of temporary, agency or migrant labour;
- the complexity and transparency of the supply chain;
- the nature of subcontracting arrangements; and
- information available regarding a supplier's policies, practices and controls.

We use relevant external information and supplier information to support our assessment of higher-risk areas.

Where risks are identified, we may engage directly with suppliers, request further information or corrective action, increase monitoring or undertake additional assessments or site visits. Where appropriate, serious or unresolved concerns may result in termination of the business relationship.

Timber Supply Chain

Timber is a significant area of focus due to the international nature of our supply chain.

Our existing supplier due diligence includes consideration of recognised certification, supplier information and geographic risk. Our timber suppliers are subject to ongoing review and engagement.

We will continue to monitor the effectiveness of our controls and seek to increase visibility of relevant supply chain risks, including risks further down the supply chain.

Supplier Questionnaires

Modern slavery questionnaires have been used to obtain information from key suppliers regarding their approach to modern slavery and human rights.

The questionnaires seek information including:

- modern slavery and human rights policies;



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- responsible personnel and training;
- visibility of the supplier's own supply chain;
- engagement with the supplier's own suppliers; and
- procedures for identifying and responding to modern slavery risks.

Supplier responses are considered as part of our wider due diligence process. Where concerns or gaps are identified, further information or corrective action may be requested.

We will continue to review the effectiveness of our supplier questionnaire process and consider where additional assurance, site visits or independent audits may be appropriate.

Training & Awareness

We recognise that employees need to understand modern slavery risks and know how to raise concerns.

Appropriate information, guidance and training will be provided to employees according to their roles and responsibilities, with particular relevance to those involved in recruitment, procurement, supplier management and contract management.

We will continue to review our training and awareness arrangements to ensure that relevant employees are able to recognise potential indicators of exploitation and understand the appropriate escalation process.

Monitoring and Measuring Effectiveness

We recognise that modern slavery is an ongoing risk and that our approach must develop as our businesses and supply chains change.

We monitor the effectiveness of our approach through activities including:

- supplier due diligence and questionnaires;
- review of supplier and contractor relationships;
- monitoring of identified risks and corrective actions;
- employee concerns and whistleblowing arrangements;
- review of relevant policies and procedures; and
- ongoing assessment of sector and geographic risks.

Where concerns are identified, we will assess the circumstances, take appropriate action and consider whether improvements are required to our controls or processes.



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Our objective is not simply to record compliance, but to continually improve our ability to identify, prevent and respond to modern slavery risks.

Progress and Priorities

During the reporting year, we will continue to focus on:

- strengthening supplier and contractor due diligence;
- improving visibility of relevant supply chains, including lower-tier suppliers;
- maintaining appropriate standards for recruitment and labour providers;
- continuing to assess geographic and sector-specific risks;
- reviewing our supplier questionnaire and risk assessment processes;
- increasing awareness among employees with relevant responsibilities;
- strengthening monitoring and follow-up where risks are identified; and
- reviewing the effectiveness of our controls and identifying opportunities for continuous improvement.

Commitment

James Walker (Leith) Ltd and the businesses within the Group are committed to preventing modern slavery and protecting human rights across our operations and supply chains.

We recognise that modern slavery can be hidden and that effective prevention requires ongoing vigilance, meaningful due diligence, responsible procurement, employee awareness and engagement with suppliers and other business partners.

We will continue to develop our approach, prioritising areas of greatest risk and taking appropriate action where concerns are identified.

Signed by:
Signed: 
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Name: John Campbell

Position: Managing Director

Date: 9 September 2026

Reporting period: 2026 Financial Year