Building Homes Strengthening Communities Improving Lives

2024/25 MODERN SLAVERY STATEMENT

OUR VISION 2030
TRANSFORMING TOMORROW

Berkeley Group

Who we are

Our purpose

To build quality homes, strengthen communities and improve people's lives.

Our vision

To be a world-class business, trusted to transform the most challenging sites into exceptional places and to maximise our positive impact on society, the economy and the natural world.

Our values

Have integrity

Be passionate

Think creatively

Respect people

Excellence through detail

The Berkeley Group Holdings plc, its subsidiary companies and their joint ventures ('Berkeley'), builds homes and communities across London, Birmingham and the South East of England.

This is Berkeley's Modern Slavery Statement for 2024/25 and it is published in compliance with the Modern Slavery Act 2015.

The actions mentioned in this statement are undertaken at parent company or subsidiary and joint venture company level as appropriate to the action. The size and complexities of Berkeley's developments mean that it can take a number of years for them to reach completion.

The turnover of its subsidiary companies can vary from year to year, taking them above and below the £36 million modern slavery reporting threshold. For that reason, Berkeley makes this modern slavery statement on behalf of all Berkeley subsidiary companies and joint ventures, all of whom adopt its terms.

This statement covers Berkeley's financial reporting year of 1 May 2024 to 30 April 2025, is signed by the Chief Executive Officer and has been approved by the Board on 31 October 2025.

Our Business

Berkeley is made up of six autonomous brands:

Berkeley Homes; St George; St James; St Joseph; St William and St Edward which is a joint venture with M&G Investments. Berkeley operates through these autonomous divisions and operating companies, each with its own board of directors.

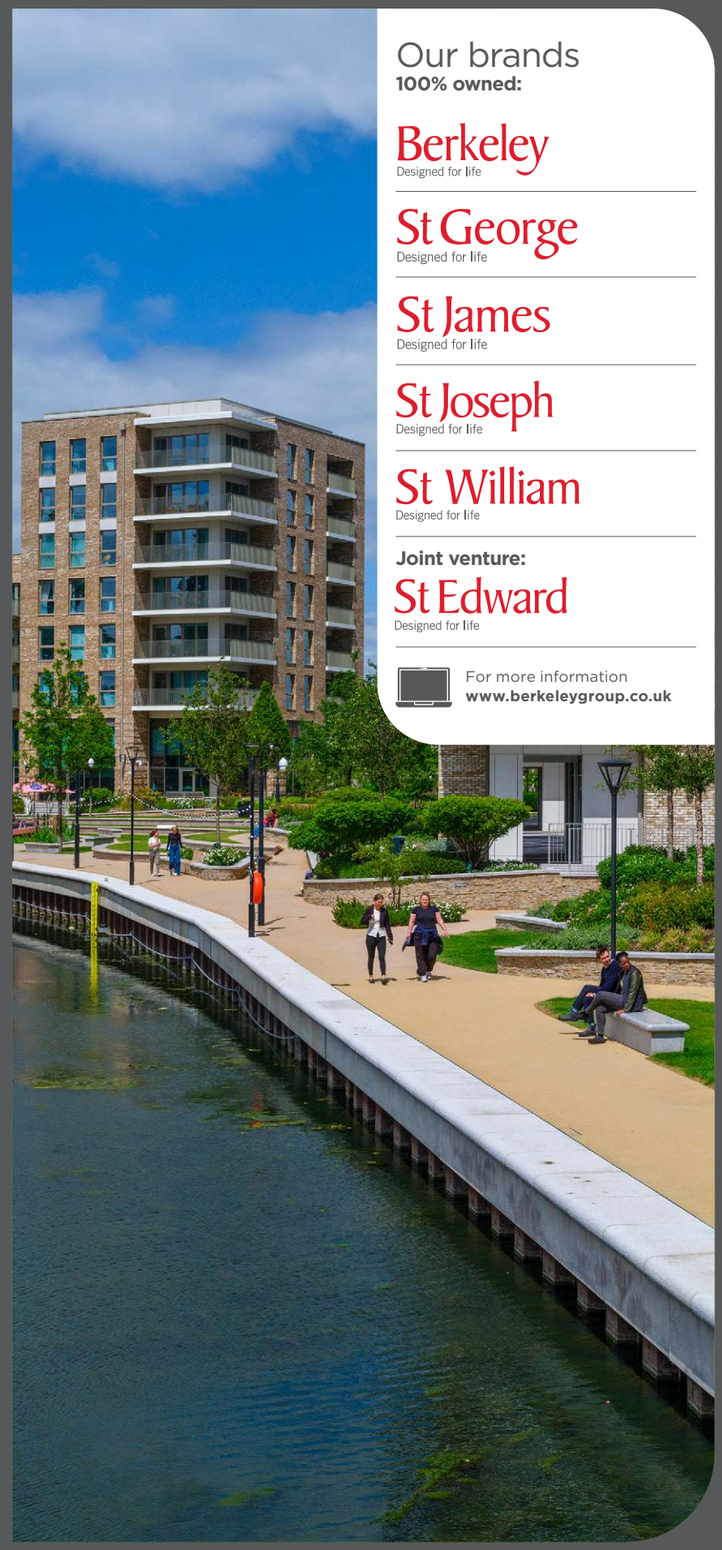
Berkeley is engaged in residential-led, mixed use property development in London, Birmingham and the South of England. We aim to transform the most challenging and complex brownfield sites into welcoming and sustainable places to live and work.

The average monthly number of persons employed by Berkeley during 2024/25 was 2,537 and an average of 7,263 contractor staff worked across Berkeley's 50 live construction sites each month. In 2024/25 Berkeley delivered 4,329 homes.

Berkeley also has eight overseas sales and marketing offices in Bangkok, Beijing, Chengdu, Dubai, Hong Kong, Shanghai, Shenzhen and Singapore. These overseas offices are not involved in any aspect of construction or development but focus primarily on customer liaison. The total number of employees based overseas in the year was 55. All Berkeley construction operations are UK based.

The developments that Berkeley creates range in size from a small number of homes to complex mixed-use urban regeneration schemes with many thousands of homes. The types of homes we build include city apartments and traditional family homes, as well as student and senior living accommodation.

Our mixed-use developments incorporate offices, shops, leisure and community facilities, hotels and restaurants. We sell our homes and commercial space to a broad range of customers: private buyers; housing associations; universities; investors and commercial occupiers.



Our brands

100% owned:

Berkeley
Designed for life

St George
Designed for life

St James
Designed for life

St Joseph
Designed for life

St William
Designed for life

Joint venture:

St Edward
Designed for life

For more information
www.berkeleygroup.co.uk

How Berkeley assesses and manages the risk of modern slavery

Over the last year, Berkeley made good progress against its commitments. These built on the processes and procedures already in place that impose contractual commitments, and the monitoring of contractors appointed by us on our developments in addition to our existing training and awareness programmes. Berkeley's risk assessment and assurance procedures include:

Risk Assessment and Appointment

1 Pre-qualification checks on all contractors that wish to be included on our approved database or undertake work on our behalf, with specific questions in relation to their approach to combatting modern slavery.

2 Additional questions requiring a higher level of detail on their approach is required as part of our tender scoring matrix which is a tool used to assess contractors based on overall value rather than cost alone.

3 Our construction contracts, purchase order terms and small contract terms include robust anti-slavery and child labour provisions that not only bind Berkeley's direct contractors and suppliers but also impose obligations on them to cascade the provisions down the supply chain.

4 Specific guidance on modern slavery for factory visits for teams across Berkeley carrying out due diligence at both UK and overseas facilities.

Effective Risk Management and Monitoring

5 New starters on our construction sites attend an induction which highlights modern slavery and how to raise concerns. This is attended by our internal and contractor workforce

6 Our sites display posters with the details of helplines available to raise any issues.

7 Each site has a modern slavery lead (the most senior person on site) who has had additional training on the possible signs of labour exploitation and forced labour.

8 Employees complete mandatory e-learning on modern slavery which is required to be refreshed every two years.

Our Supply Chain

Berkeley has identified its salient modern slavery risks. The procurement of materials and the supply of labour are two key areas within the supply chain that Berkeley has identified as presenting a risk of modern slavery.

Berkeley's supply chain is large and complex to reflect the requirements of its different developments. It primarily consists of 1,100 approved, directly appointed contractors, who undertake work for us on a supply and install basis, the majority of which are based in the UK. Supporting this operational activity are approximately 600 manufacturers and suppliers, who we trade with either on a direct or indirect basis.

Materials used in the construction of Berkeley's developments are procured from around the world both directly and via our contractors. Berkeley risk assesses each contractor and where they source materials, always mindful of countries where increased risks of modern slavery and/or child labour have been identified.

Berkeley sources limited supplies of building materials directly from manufacturers and suppliers, but the majority of the materials used in our construction operations are procured by the trade contractors engaged to carry out the building works. The manner in which these materials are sourced by those contractors forms part of the embedded process for risk assessing and monitoring those contractors.

In addition, over the last year, Berkeley has continued to identify the construction materials it most commonly uses and put in place a manufacturer framework agreement to enable purchase of those materials not only by itself but also by its contractors. All manufacturers must meet stringent due diligence requirements before signing the framework agreement. This includes a modern slavery risk assessment. Each manufacturer who becomes a participant in the manufacturer framework is required to meet the same stringent modern slavery compliance obligations as are required of Berkeley's contractors.

Berkeley has identified the recruitment of labour and specifically migrants and temporary labour as a human rights and modern slavery risk. In addition to Berkeley employees, the construction operatives working on our sites are engaged through trade contractors with whom Berkeley contracts.

Accordingly, Berkeley is not directly involved in the recruitment process. Berkeley's modern slavery risk assessment and engagement with industry peers and human rights experts through membership of formal groups and hubs has identified labour supply by contractors as a higher human rights risk not least because some of this labour is presently from outside the UK.

Berkeley mitigates this risk by contractually requiring its contractors to comply with all modern slavery legislation and, in addition, Berkeley carries out its own right to work checks on all workers on our sites. These checks are carried out using a Government certified third-party digital identity service provider during a mandatory in-person induction process and requires each individual to provide photographic identification.

As a consequence of the continued subdued construction market conditions putting increased commercial pressure on companies to tender competitively for work, Berkeley has identified that there is greater risk that its appointed contractors may consider sourcing lower cost materials from alternative suppliers. Examples of this include plasterboard and bricks from Turkey, glass from Dubai, bricks from South Africa and steel from South East Asia.

Berkeley is aware that such a risk may require greater diligence on its part than the contractual obligations it has already secured from its contractors. Berkeley is cognisant of the associated increased modern slavery risk this may create and has worked closely with its appointed contractors to ensure full due diligence is undertaken and modern slavery compliance demonstrated when their contractors engage with new suppliers.

We collaborate with industry and are part of the Supply Chain Sustainability School's Built Environment Against Slavery (BEAS) Group, the largest anti-slavery collaboration in the UK built environment. Membership of such groups improves our understanding of risks as they emerge, through lessons learned shared by peers or intelligence shared by experts.

This year, through membership of the BEAS Group we assisted in the delivery of an industry-wide conference on 'Insights, Actions and Collaboration'. An awareness video that Berkeley co-funded with other industry peers and Unseen was launched at this conference, and attendees also benefitted from sessions on uncovering emerging risks and understanding how to support survivors and implement effective remediation strategies.

Progress against 2024/25 Commitments

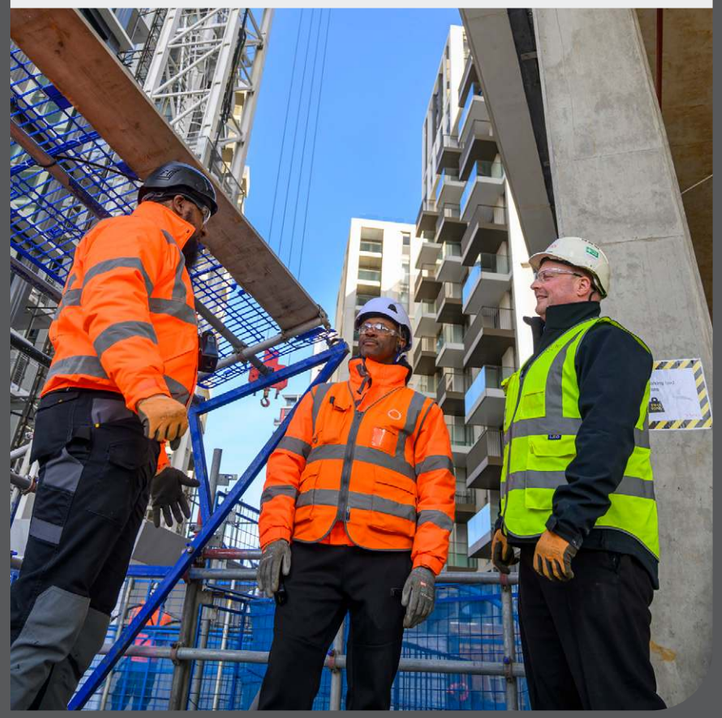
- Contribute to the Supply Chain Sustainability School's delivery of an industry-wide conference and collaborate on industry-wide resources to be published nationally.
- Roll out the industry awareness video on labour exploitation in partnership with Tier 1 industry peers and Unseen, to be used by the entire built environment sector.

Achieved Ongoing

Our Policies

Berkeley is committed to the respect and promotion of human rights and the avoidance of modern slavery and child labour in all aspects of business. This includes towards our employees, customers, contractors, suppliers and communities within our area of influence. Human rights are implicitly recognised in everything that Berkeley does, as demonstrated in our company policies, notably our Human Rights, Modern Slavery and Child Labour Policy, Business Ethics Policy, and our Whistleblowing Policy.

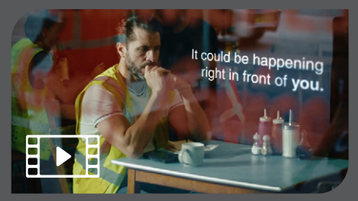
Berkeley requires all employees and anyone conducting business on behalf of Berkeley to comply with its Human Rights, Modern Slavery and Child Labour Policy and Business Ethics Policy. All employees are required to confirm that they have read and understood these Berkeley policies. Non-compliance can result in disciplinary action up to and including dismissal.



Berkeley expects equivalent standards of conduct from its business partners. Non-compliance with either the Human Rights, Modern Slavery and Child Labour Policy or Business Ethics Policy by anyone working for or conducting business on behalf of Berkeley can result in termination of their contract.

Berkeley has been part of a construction sector peer to peer working group with representatives from Laing O'Rourke, Skanska and Morgan Sindall since 2023. Membership of this group has enabled us to share our approach and discuss the approaches adopted by others to combat modern slavery.

One focus this year has been the roll out of a publicly available short video to be used in inductions to further raise awareness of modern slavery and potential labour exploitation and promote action. In collaboration with Unseen, the filming was part-funded and developed by Berkeley and took place at a Berkeley site. This video was launched to industry at the Supply Chain Sustainability School Conference in October 2024 and is now embedded within Berkeley's e-learning module and site inductions.



Scan the code to watch the video on modern slavery

Berkeley's policies that are specifically relevant to combatting the risks of modern slavery:

Human Rights, Modern Slavery and Child Labour Policy

- Berkeley strives to engage in an open and honest dialogue with our manufacturers, contractors and sub-contractors about the risks of modern slavery and child labour occurring in our supply chain.
- Berkeley assesses manufacturers and contractors on key social and ethical issues (assessing and considering modern slavery, workforce development/training, sustainability and use of overseas contractors) within the early stages of the contracting process.
- Berkeley incorporates consideration of such social and ethical issues into the contractor evaluation and appointment process.
- Berkeley contractually incorporates its anti-slavery and child labour compliance provisions and requisite standards into its contracts for goods or services.

Business Ethics Policy

- Berkeley's stated objective is to comply with the protection of human rights and avoidance of modern slavery and child labour in all its dealings.
- In all third-party relationships, Berkeley will require our business partners to operate with values and principles equivalent to ours, comply with our Human Rights, Modern Slavery and Child Labour Policy (amongst others) and where possible impose sanctions where there has been a breach.

Whistle-blowing Policy

- The policy applies to all employees, workers, agents, contractors, sub-contractors, suppliers (at any tier of the supply chain), business partners and customers of Berkeley.
- Berkeley makes explicit reference to concerns that relate to unethical practices, such as modern slavery, acknowledging its importance.

Progress against 2024/25 Commitments

- Review the Group's Human Rights, Modern Slavery and Child Labour Policy in the context of the new statutory guidance on Transparency in Supply Chains.

Achieved Ongoing

Due Diligence and Risk Assessment

Berkeley has undertaken a complete review of its risk assessments of the modern slavery risks to the business and consequently has affirmed that its most salient modern slavery risk arises in the appointment of contractors and the procurement of materials. While each of Berkeley's relationships in these groups are managed through contracts that are subject to termination in the event of non-compliance with the requisite modern slavery laws and standards. This is backed up by detailed due diligence undertaken in respect of each of these areas and the associated mitigations identified.

Appointment of Contractors

Berkeley's contracts include robust anti-slavery and anti-child labour provisions that not only bind Berkeley's direct contractors and suppliers but also impose equivalent obligations on that contractor/supplier when contracting and dealing with their own suppliers, Berkeley's indirect supply chain. These provisions have been implemented throughout the entire construction supply chain and demonstrate Berkeley's commitment to combatting modern slavery and child labour.

Berkeley operates robust competency and pre-qualification checks on all contractors that wish to be included on our approved contractor database (enabling them to be tender for and be contracted for work). In addition, Berkeley conducts due diligence on workers' contracts; asking the potential contractor detailed questions about its policies and procedures and how they identify and manage the risk of modern slavery within their business and supporting material supply chain. Berkeley seeks evidence that the contractor is taking proper measures to prevent modern slavery in their business and in their supply chain and seeks specific assurance and associated evidence in relation to workers' contracts down the supply chain.

Furthermore, all contractors are provided with access to Berkeley's Supply Chain Portal which includes copies of our Human Rights, Modern Slavery and Child Labour Policy, Business Ethics Policy and Whistleblowing Policy. In accordance with our contractual requirements, contractors are required to review the policies via the Supply Chain Portal and confirm acceptance of their terms each time they are successful in securing work from us.

Procurement of Materials

Berkeley has made the strategic decision to standardise common base materials and manufacturers across the group where possible. This approach creates closer and more collaborative relationships, helping to mitigate risk and enhance resilience.

All manufacturers involved with this process are required to complete the detailed modern slavery due diligence questionnaire, equivalent to that used for contractors (i.e. workers' contracts, policies and procedures, convictions, identification and management of related risks). As with the contractors, the responses from potential suppliers are evaluated and assessed.

Berkeley maintains a Technical Steering Committee chaired by a member of the Executive Committee that is responsible for the production of Berkeley's Technical Standards for 12 product groups. Berkeley's Technical Standards inform product choice, improve business efficiency and provide a framework through which Berkeley is able to investigate its material sourcing strategies more closely, including in the context of modern slavery.

Teams across Berkeley carry out factory visits within our supply chain for a number of reasons, including to conduct due diligence on a contractor, to review factory facilities, to observe the manufacturing process and working conditions, to review the quality of products and to attend design meetings.

We have produced guidance for staff visiting factories, which requires them to be alert and educates them in recognising the signs of modern slavery and also requires them to complete an assessment during the visit which is then reviewed centrally.

Berkeley has designated specific staff to liaise with each key trade contractor. These Berkeley staff provide support to address queries and issues that sit outside of a specific project/contract. As part of this, Berkeley has identified 10 key trades including frame, façade, mechanical, electrical and brickwork. Within these trades, Berkeley conducts a review of contract awards across the Group, alongside spend profile and performance, allowing us to identify our 94 key trade contractors. Modern slavery is included as a specific agenda item for in depth discussion with our key trade contractors. Berkeley will continue to engage with our key trade contractors on modern slavery to enhance awareness and to discuss the mitigation of modern slavery risks including assessing the effectiveness of measures implemented.

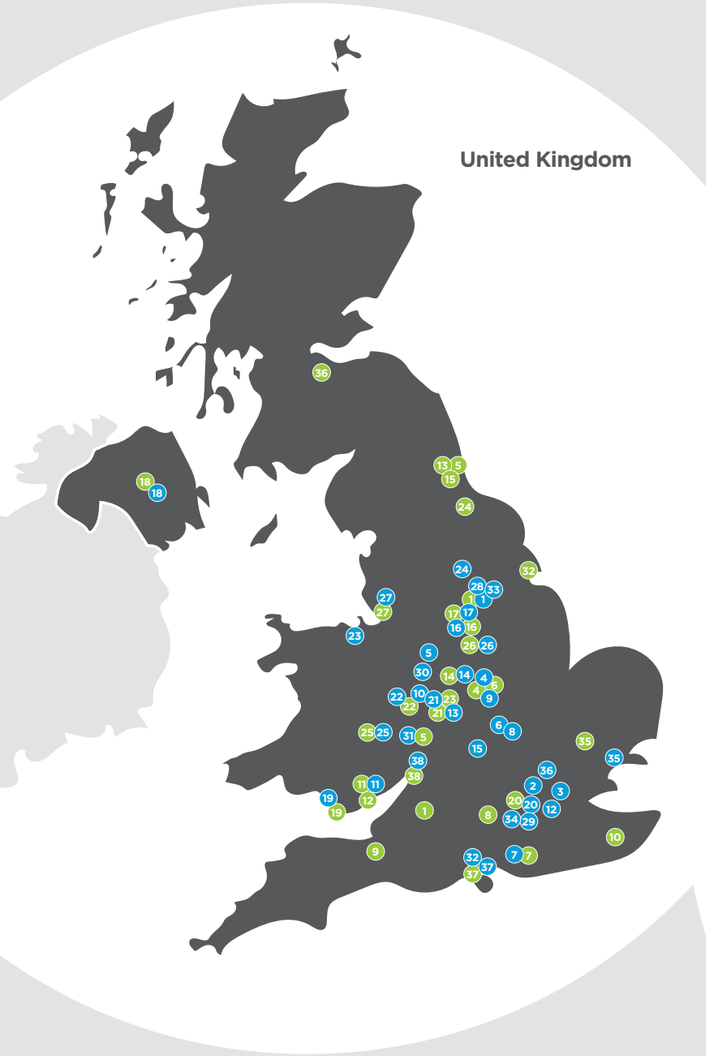
Progress against 2024/25 Commitments

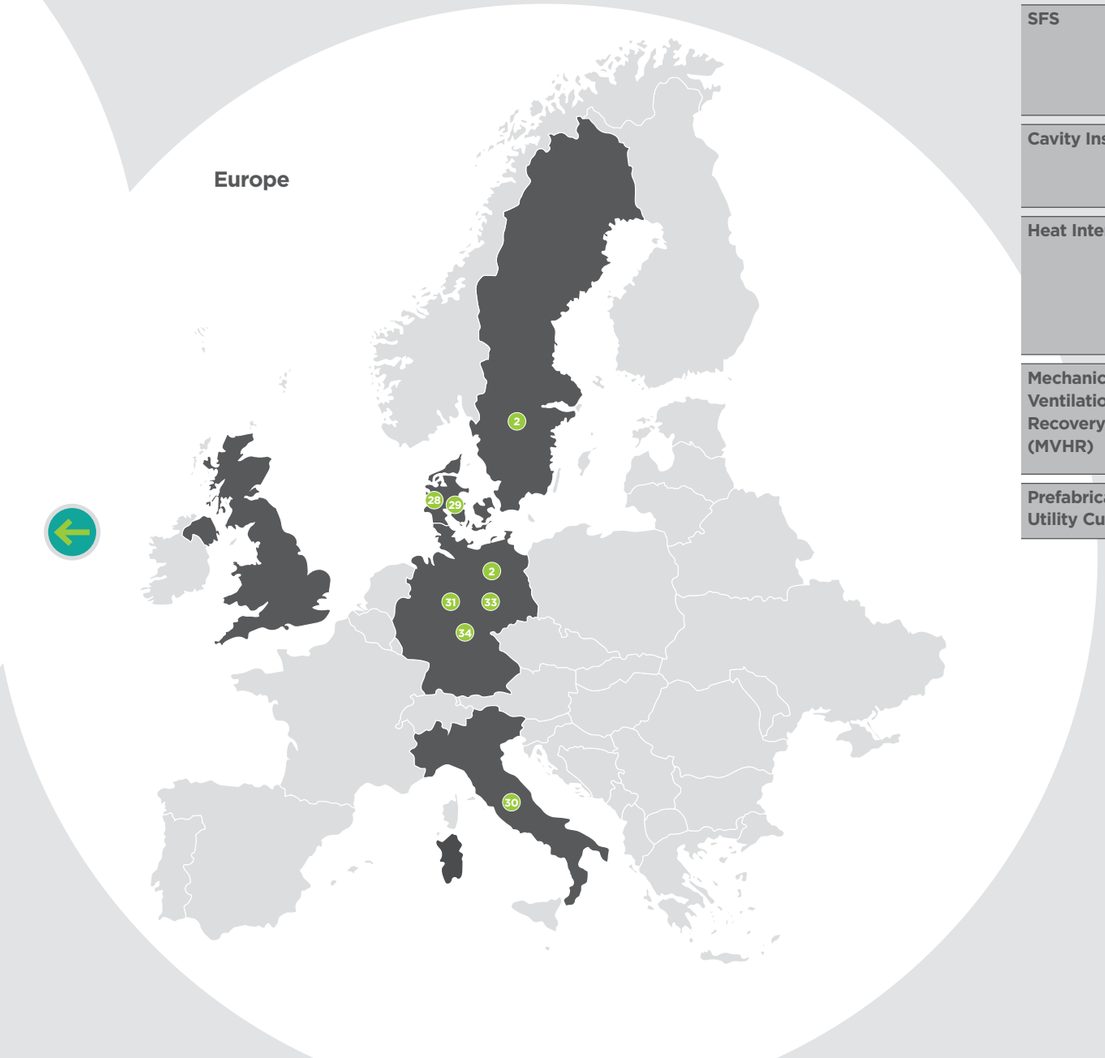
- A modern slavery risk assessment is conducted in respect of all materials added to Berkeley's common materials framework. This approach is now embedded at Berkeley.

Achieved Ongoing

Mapping our Supply Chain

Following standardisation across 12 key product groups, covering materials such as pipework and drainage, bricks, blocks, insulation, cavity trays, lintels, paint and mechanical and electrical equipment, we have streamlined the suppliers and materials used across Berkeley, improved supply chain mapping of both the country of manufacture and raw material origin, and gained a better understanding of the geographical risks of our supply chain to inform the proactive actions required for future years.





Product Group	Manufacturer	Location of Manufacture
Drainage	1 Wavin – Doncaster	1 Chippenham/Doncaster
	2 Uponor – Watford	2 Sweden/Germany
	3 Buteline – London	3 New Zealand
Bricks	4 Ibstock – Leicester	4 Leicestershire
	5 Wienerberger – Cheadle	5 Worcestershire/Durham
	6 Forterra – Northampton	6 Leicestershire
	7 Michelmersh – Haywards Heath	7 Haywards Heath
Blocks	8 Forterra – Northampton	8 Thatcham
	9 Aggregate Industries – Leicestershire	9 Somerset
	10 Tarmac – Wolverhampton	10 Kent
Lintels	11 IG Lintels – Cwmbran	11 Cwmbran
	12 Catnic – London	12 Newport
	13 Birtley – Solihull	13 County Durham
Masonry Support	14 IG Masonry Support – Swadlincote	14 Swadlincote
	15 Birtley – Solihull	15 County Durham
	16 Leviat – Sheffield	16 Sheffield
	17 Wincro – Sheffield	17 Sheffield
Cavity Trays	18 Keyfix – Cookstown NI	18 Cookstown NI
	19 Sidrise – Bridgend	19 Bridgend
Paint	20 Akzo Nobel (Dulux) – Slough	20 Slough
SFS	21 Hadley – Smethwick	21 Smethwick
	22 Metsec – Oldbury	22 Oldbury
	23 Kingspan – Flintshire	23 Birmingham
	24 Remagin – Leeds	24 Newton Aycliffe
Cavity Insulation	25 Kingspan – Leominster	25 Pembridge
	26 Unilin – Chesterfield	26 Chesterfield
	27 Knauf – St Helens	27 St Helens
Heat Interface Units	28 Wavin – Doncaster	28 Denmark
	29 SAV – Woking	29 Denmark
	30 Intatec – Stafford	30 Italy
	31 Worcester Bosch – Worcester	31 Germany
	32 Essco – Southampton	32 Hull
Mechanical Ventilation Heat Recovery Units (MVHR)	33 Wavin – Doncaster	33 Germany
	34 Zehnder – Camberley	34 Germany
	35 Titon – Colchester	35 Haverhill Suffolk
	36 Mitsubishi – Hatfield	36 Livingston, Scotland
Prefabricated Utility Cupboards	37 Essco – Southampton	37 Southampton
	38 Resipont – Gloucester	38 Gloucester

Effectiveness and Training

Effectiveness

Since the Modern Slavery Act 2015 came into effect, Berkeley has received three whistle-blowing complaints that alleged modern slavery, two of which proved to be unfounded claims, with one under investigation since 2022 without any conclusion.

Of the two unfounded complaints, one related to right to work checks that a sub-contractor required from their employee and the other related to the value of work that a sub-contractor applied to work by its employees. Berkeley investigated both these complaints with our contractors and neither of them gave rise to any concerns that there had been modern slavery taking place. The report and investigation of these matters enabled Berkeley to work with its contractors to understand the matters subject to the complaint. Berkeley continues to encourage the reporting of modern slavery concerns in its policies and demonstrates this on site, through site inductions and through our site poster campaigns.

In 2022, following the completion of our mandatory modern slavery e-learning module, a member of our staff followed our internal process to report a concern about a contractor's workforce to their Site Modern Slavery Lead which led to a report to the UK Modern Slavery Helpline and the police. Berkeley has contacted the police and the Helpline for updates and remains to be informed as to whether our concern was well founded.

Nonetheless, we have supplemented our communication and training material to further ensure that our employees and wider workforce are aware of the signs and the support available for victims of modern slavery and labour exploitation. The circumstances have also been communicated to all Site Modern Slavery Leads (the most senior person on each site) within their training to remind them to remain vigilant in spotting signs and maintaining communication with everyone on site to create an environment where potential victims would feel able to speak out. The detection and reporting of human rights and modern slavery breaches is important to Berkeley, and all staff members are encouraged to raise concerns in any part of our business or supply chain.

We are encouraged by the effectiveness of our internal training and will continue to support any investigation into human rights violations associated with our operations.

In March 2024 Berkeley responded to the Government's Call for Evidence to address the topic of the efficiency of reporting in relation to the Modern Slavery Act 2015 referring to the apparent failure to respond to our notification. As over three years has passed since Berkeley's notification, it is apparent that the external investigations by the police and the Helpline have not been concluded within a timely manner. Accordingly, Berkeley supports additional focus in the UK on the process for how the relevant external organisations undertake investigations/reviews of potential issues identified as well as how they feed back to the organisations who make such reports.

Berkeley continues to be assessed annually by the CCLA Modern Slavery UK Benchmark. We are pleased to report high compliance with the Modern Slavery Act and conformance with Modern Slavery Guidance. Overall we are assessed as being in Tier 2, indicating 'evolving good practice'.

Progress against 2024/25 Commitments

- Roll out the industry awareness video on labour exploitation in partnership with Tier 1 industry peers and Unseen, to be used by the entire built environment sector.

Achieved Ongoing

Training

All our employees are required to complete an e-learning training course on modern slavery. The e-learning includes an overview of the issue and the relevance to our industry and informs staff members of signs they could look out for and how to report any concerns. Staff are required to undertake refresher e-learning on modern slavery every two years. Berkeley monitors and proactively manages completion rates. This year we have updated the training and it now includes the video produced in partnership with Tier 1 industry peers and Unseen.

All Site Modern Slavery Leads, a role assigned to the most senior person on each of our sites, are required to attend more in-depth and interactive training to ensure competence in responding to, and escalating modern slavery concerns. This year we have run training sessions to new Site Modern Slavery Leads.

On our sites: Inductions

It is a Berkeley requirement for all sites to deliver an in-person induction that includes a section on modern slavery and labour exploitation. This is termed 'worker welfare' to widen the focus to include acts of exploitation, such as unlawful deductions from wages or the absence of an employment contract and thus avoid using a term that victims of such abuses may not relate to. This year, we have updated the induction to include the video produced in partnership with Tier 1 industry peers and Unseen.

Berkeley provides an information pack that documents our approach and procedures relating to modern slavery and labour exploitation to those delivering the site inductions to enable them to answer any questions from those listening.

On our sites: Raising Awareness

We continue to display on-site modern slavery posters to raise awareness of signs of modern slavery and provide details of an independent charity helpline.

We also display posters to help our workforce understand their employment rights under UK law.

This includes a QR code to the Gangmaster and Labour Abuse Authority's workers' rights webpage. These posters are displayed on all Berkeley sites and are in English, Romanian, Albanian and Polish which are presently the most commonly spoken languages on our sites. Additionally, we ensure that the 'SOS' hand signal initiative produced by Stronger Together which aims to act as a tool to enable victims of modern slavery to seek help is communicated through toolbox talks and signage on site.

On our sites: Raising a Concern

Part of our procedure to report any concern includes each of our sites having a Site Modern Slavery Lead, a role which is automatically assigned to the most senior person on any site to ensure that we have clearly identifiable individuals who are responsible for reporting modern slavery and who can act as a point of contact for raising concerns.

Effectiveness and Training continued

Corporate Leadership and Continuous Improvement

Berkeley's approach to the management of modern slavery risk is implemented by a cross functional Modern Slavery Working Group. Chaired by the Group Executive for Responsible Business, the Group includes representatives from our Commercial, Construction, Legal and Responsible Business teams.

The Group meets regularly (usually six-weekly) to ensure that Berkeley is effectively monitoring and managing its modern slavery risks and considering its modern slavery risks in the context of the wider market and economic conditions as they evolve with the object of assuring the Executive Committee that Berkeley's processes deliver effective modern slavery risk management that aligns to the needs of the business.

Berkeley continues to issue updated guidance on how to tackle the modern slavery risks that may arise through our production, construction and commercial activities through the relevant Executive Committees.

This continuing work includes bulletins highlighting examples of modern slavery cases involving the construction industry to increase awareness of modern slavery risks, provide information on how to identify them and how to report any concerns.

Berkeley continues to give further thought to other key groups within our business that may benefit from receiving this guidance and will review cases and issue bulletins on combatting modern slavery where relevant.

Berkeley is a partner of the Considerate Constructors Scheme (CCS) therefore each of Berkeley's sites is registered with the CCS. Every site registered with the CCS is subject to an external audit twice a year. The CCS checklist includes a question on how the organisation has ensured the competency and legitimacy of the workforce on site. The approach of the CCS means that the processes and procedures in relation to workforce competence and legitimacy at each Berkeley site are subject to external audit. Additionally, the CCS has launched an extensive toolkit on the risks associated with illegal workers which Berkeley has promoted across its businesses led by the Executive leadership.

Berkeley has continued to be an active participant of a construction industry peer to peer working group.

Commitments for 2025/26

Berkeley will continue to combat the risks of modern slavery and child labour in its supply chain and to their eradication if found by undertaking the following actions in the coming year:

Signed

Richard Stearn
Chief Executive Officer
31 October 2025

For and on behalf of the Board of The Berkeley Group Holdings plc for the year 2024/25

1. Conduct an independent assessment of the implementation of our Human Rights, Modern Slavery and Child Labour Policy with reference to the new statutory guidance on Transparency in Supply Chains.
2. Hold a supply chain conference to bring together members of our contractor and consultant supply chain, ensuring that combatting modern slavery is a key agenda item.
3. Incorporate Modern Slavery Risk Assessment Training into new Berkeley training for all commercial employees to be led by an independent law firm.
4. Collaborate with industry to take action against modern slavery, through contributing to the Supply Chain Sustainability School's Built Environment Against Slavery Group and the peer to peer group with Tier 1 contractors.
5. Continue to ensure that all Modern Slavery Leads have completed additional training on modern slavery as well as additional teams such as mental health first aiders and health and safety staff.

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