

# Anti-Slavery Policy

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The RTC Group has a zero tolerance approach to all forms of modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships.

### 1. Aims and Objectives

This policy explains our commitment to limiting the risk of modern slavery occurring within our own business or infiltrating our supply chains or any other form of business relationship.

This policy applies to all persons working for or on behalf of the RTC Group in any capacity, including employees, directors, officers, agency workers, contractors, consultants and any other third party representative.

We expect all who have, or seek to have a business relationship with the RTC Group to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

This policy will be used to underpin and inform any statement on Slavery and Human Trafficking that we produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act (MSA) 2015.

### 2. Status of this policy

This policy will be reviewed by the Company's Board of Directors on a regular basis at least once a year.

This policy does not give contractual rights to individual employees and we reserve the right to alter any of its terms at any time, although we will notify applicable parties of any changes. Any updated versions will be uploaded onto The Company Intranet.

### 3. What do we mean by Modern Slavery?

Modern slavery can take many forms. It is a complex and multi-faceted crime. The MSA 2015 covers four key activities:

- **Slavery:** ownership is exercised over an individual;
- **Servitude:** involves the obligation to provide services imposed by coercion;
- **Forced and compulsory labour:** all work or service, not voluntarily performed, which is obtained from an individual under the threat of force or penalty; and

- **Human trafficking:** involves arranging or facilitating the travel of another with a view to exploiting them.

Other forms of slavery, which we will not tolerate, but are not specifically referenced in the MSA 2015 include, but are not limited to:

- **Child labour:** involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspects of our business and business relationships.

#### **4. How we seek to embed our anti-slavery policy in practice**

To underpin our policy commitment, we are in the process of implementing the following measures over the course of the next few years:

- We will conduct risk assessments to determine which parts of our own business and which of our supply chains are most at risk from modern slavery;
- Where appropriate, as informed by our risk assessments, we will undertake pre-screening of prospective suppliers in relation to the effectiveness of their existing safeguarding controls and practises in relation to preventing modern slavery occurring within their organisation; and
- Our contractual documentation will be reviewed in relation to specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour and the use of child labour in line with this policy.

#### **5. Responsibility for this policy**

The board of directors has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.

The Group HR Department will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day-to-day performance of their roles.

## **6. Communication and employee awareness training**

The Group HR Department will ensure that all relevant staff receive adequate training on this policy and any supporting processes applicable to their role. Such training forms part of the Company's induction processes.

In addition, staff will receive training on the broader issues of modern slavery so as to assist them in appreciating the extent of the problem of modern slavery and identify the individuals/areas of the business that may be at risk from practices of modern slavery.

## **7. Breaches of this policy**

Any breaches of this policy will be taken seriously and dealt with on a case by case basis.

The breach of this policy by an employee, director or officer of the RTC Group may lead to disciplinary action being taken in accordance with ***The RTC Group Disciplinary Procedure***. Serious breaches will be regarded as gross misconduct and may lead to immediate dismissal in accordance with our disciplinary procedure. Serious breach by agency workers, contractors consultants or suppliers may lead to their assignment/contract being terminated.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the Group HR Department.

## **8. Related Policies**

Other related policies which may be relevant include:

- ***RTC Group Disciplinary Procedure***