

# Remediation Policy following a suspected instance of Modern Slavery

## 1. Introduction

Ganymede is committed to ethical recruitment and labour supply practices, ensuring that all workers are treated fairly and with dignity. We recognise our responsibility to identify, prevent, and address instances of modern slavery within our operations and supply chains. This policy outlines the procedures for remediation when modern slavery is suspected or identified.

## 2. Purpose and Scope

This policy applies to all employees, contractors, and partners of Ganymede and covers:

- The remediation process for identified cases of modern slavery.
- Collaboration with affected individuals and stakeholders to provide appropriate support.
- Compliance with relevant UK legislation, including the Modern Slavery Act 2015.

## 3. Procedures for Remediation of Identified Cases

If modern slavery is suspected or confirmed, the following steps will be taken:

### 3.1 Immediate Action

Immediate action will be taken in line with our Reporting a suspected instance of Modern Slavery policy which can be accessed via Cezanne.

### 3.2 Reporting and Investigation

We will take the following steps to ensure that all suspected cases are reported and investigated appropriately:

- Report the case to the HR Team.
- HR will notify the appropriate authorities, such as:
  - Modern Slavery Helpline (08000 121 700)
  - Gangmasters and Labour Abuse Authority (GLAA)
  - Local law enforcement or social services
- Conduct an internal investigation in collaboration with relevant regulatory bodies while ensuring minimal disruption to affected individuals.

### 3.3 Providing Support and Remediation

We recognise that remediation can take various forms, depending on each individual's needs. Our commitment is guided by the following principles:

#### Victim-centred remediation

Our first priority will always be the protection of anyone who has experienced slavery or exploitation. We will adopt a victim-led and consultative approach, involving relevant stakeholders to achieve the best possible outcome for the individual concerned. Wherever possible, the wishes and needs of the victim will guide our

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actions, unless doing so poses a serious risk of harm to them or others. We are committed to protecting individuals from both physical and significant moral harm and will ensure this protection is maintained even if the affected person chooses not to pursue further action. Throughout the process we will maintain confidentiality, ensure a timely response, and provide ongoing support. Any personal data collected in the course of remediation will be processed in accordance with data protection legislation and only shared where strictly necessary and with appropriate safeguards. We fully respect the victim's right to pursue other forms of remedy at any stage.

## Individual case management

Every case will be treated on its own merits. We will consider each person's unique circumstances and create a tailored care plan to support their specific needs.

## Expert guidance

We acknowledge that we may not have the specialist expertise needed to assess or deliver the required support for victims. In such instances, concerns will be escalated to relevant partners such as the National Referral Mechanism, or the police as appropriate. In non-urgent cases, we will first obtain the victim's consent to share their details with stakeholders, including law enforcement. Where an affected individual declines to engage, we will seek guidance from third-party charities and NGOs on the most appropriate next steps.

## Collaboration within our supply chain

If modern slavery is detected within our supply chain, we are committed to working constructively with suppliers to address and eliminate the issue, and to support affected individuals. This collaborative approach is our preference, but if a supplier refuses to engage, we may need to reconsider our partnership. In all cases, we will ensure any sharing of victim information is done with the victim's consent, except where there is a legal obligation to disclose.

## Ongoing victim support

We are dedicated to maintaining a victim-centred approach and will explore ways to support affected individuals throughout the remediation process. With the guidance of relevant experts, we will consider what remedy we can offer and will utilise our resources as effectively as possible.

## Continuous improvement

Where potential cases of modern slavery are identified, we will carry out thorough investigations to understand the root causes of exploitation. We will take steps to strengthen our own processes, as well as those within our supply chain, to prevent repeat occurrences. Our approach will be continuously reviewed and adapted to ensure

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it remains suitable and effective, building in lessons learned to improve our strategy. Where appropriate, and if requested, we will also support individuals who have raised concerns.

## 4. Collaboration with Stakeholders

Ganymede is committed to working with a range of stakeholders to effectively address modern slavery issues:

### 4.1 Internal Collaboration

Our internal efforts to address modern slavery will include the following measures:

- We will train staff and recruiters to identify and respond to modern slavery indicators.
- We will ensure senior management oversight of all reported cases and remediation efforts.

### 4.2 External Collaboration

Our commitment to working with external bodies is reflected in the following actions:

- Engage with law enforcement, regulatory bodies, and worker rights organisations to strengthen detection and prevention mechanisms.
- Collaborate with charities and NGOs to provide support services for affected individuals.
- Share best practices with clients and suppliers to ensure ethical recruitment and labour practices.
- All suppliers will be expected to cooperate fully with our investigations and uphold our supplier code of conduct, which includes zero tolerance for modern slavery.

## 5. Continuous Improvement and Monitoring

Our commitment to continuous improvement is supported by the following actions, which help us monitor and strengthen our approach to preventing modern slavery:

- The Modern Slavery Steering Group will review and update this policy to ensure it aligns with evolving legal and ethical standards.
- Conduct audits and risk assessments to identify vulnerabilities within our supply chain.
- Provide annual training for staff to ensure continued awareness and compliance.

## 6. Contact Information

For concerns related to modern slavery, contact:

- RTC Group HR Team – Email: [hr@rtcgroupplc.co.uk](mailto:hr@rtcgroupplc.co.uk) Telephone: 01332 861816
- Modern Slavery Helpline – 08000 121 700