



# HR\_25

## **Slavery and Human Trafficking Policy**

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Retail Living Space Commercial

# Document Control

This document will be issued to all relevant parties. All amendments will be issued to the relevant parties by means of a RG Group document transmittal sheet.

Revision	Date	Description of amendments/changes	Authorised by:
00	Sept 2018	Created as part of Company Policy Development	MD

As set out in our Policy Statement, RGCM Limited welcome the introduction of the Modern Slavery

Act 2015 (MSA) and are committed to ensuring that there is no modern slavery or human trafficking in any part of our business and supply chains, and all who work with us are expected to support us and comply with the MSA.

This Policy sets out how the Company will meet its obligations under the MSA and the reasonable steps we will take to ensure that slavery or human trafficking is avoided in all parts of our business

### Objectives

The objective of this Policy is the identification of key issues and risks, the definition and setting out of our expectations, including all contracts with suppliers, working closely with our employees, clients and supply chain and the encouragement of reporting of any concerns.

## Assessment

Fundamental to achieving the objectives of this policy is the assessment of the risks existing in the various parts of our business, which are primarily as follows:

## Company Staff

All persons directly employed by the Company are vetted and interviewed before being engaged by the Company and all are required to provide:

1. Copy of their passport or other official identification document if they do not hold a passport
2. Copy of their permit to work in the UK where required
3. Their National Insurance number
4. Home address and contact details
5. Nominated UK bank details

All payments of salary etc are paid directly into their nominated bank account.

All Company Staff are in regular contact with the Company's directors or senior management and there have never been any instances of slavery or trafficking or any suspicion of such activities but we continue to be vigilant at all time.

## Agency Staff

Agency staff are engaged via specialist recruitment/agency companies who are all UK based and therefore required to comply with the MSA and are required to provide copies of their policies for compliance with the MSA to the Company.

As with Company Staff, all Agency staff are in regular contact with the Company's directors or senior management and there have never been any instances of slavery or trafficking or any suspicion of such activities but we continue to be vigilant at all time.

RG only use approved and reputable UK companies to source agency personnel and all are subject to vetting prior to being used and subject to regular compliance review.

## Supply Chain

Our supply chains include consultants and advisors, specialist trade contractors and sub-contractors and suppliers of goods, equipment, materials and plant, the large majority being UK registered and based, and as such required to comply with the MSA, and we ensure that they are fully aware of our Policy in respect of the MSA and take all appropriate measures to ensure compliance.

The Company's directors or senior management are in regular direct contact with consultants and advisors, specialist trade contractors and sub-contractors staff working directly on our projects, and we are not aware of any instances of slavery or trafficking or any suspicion of such activities but we continue to be vigilant at all time.

The Company has relatively little direct contact with the staff of suppliers of goods, equipment, materials and plant but the large majority are UK based companies and again we are not aware of any instances of slavery or trafficking or any suspicion of such activities but we continue to be vigilant at all time.

### Compliance

All Company staff and Agency staff are required to be aware of and comply with this Policy.

All of our supply chain are required to comply with the MSA and to have in place procedures for the identification and avoidance of Modern Day Slavery and Human Trafficking and we have no reason to believe that any of them do not comply.

All UK companies/organisations with a turnover or group turnover of E36 million or more which are either incorporated in the UK or carry on a business in the I-JK, must have a written Modern Day

Slavery and Human Trafficking Policy and Policy Statement that meets the requirements of the MSA and must ensure that the requirements of the policy are adhered to at all times and that any breaches are reported to the Company.

All of our supply chain will be made aware of the Company's Policy, and will be expected to comply with its requirements as applicable to them and to support the Company in meeting the objectives of our Policy.

All of our supply chain are vetted before contracts are placed with them and compliance with the MSA is mandatory, with regular compliance reviews carried out.

## Reporting

Any suspicion of slavery or human trafficking is to be immediately brought to the Company's attention by reporting this to the MSA Director, Steve Roe, or any other director, and a thorough investigation will be carried out by the Company.

Any reports of possible slavery or human trafficking made in good faith, will be treated on a confidential basis, except only where disclosure to a relevant authority is required, and without fear of detriment in accordance with the Company's "Whistleblowing" Policy.

## Breaches

Any reported breaches of the MSA will be investigated and action taken as appropriate, which could result in reporting the breach to the relevant authorities.

Breaches by any of the supply chain, could result in contracts with the Company being terminated.

Any breaches by employees of the Company will be dealt with in accordance with the Company's Disciplinary procedures which could result in a written warning or possible dismissal for misconduct or gross misconduct.

## Communication

All directors and employees have been briefed on this Policy and are provided with appropriate training as necessary and compatible with their roles and responsibilities.

Company Staff have been made aware of this Policy and a series of seminars are being held on our sites and our offices to explain the requirements of the policy and in particular the importance of the Identification Guidance in being aware of victim profiles, control methods and signs/symptoms of slavery which are key issues in the identification of potential slavery.

All of our supply chain will be made aware of this Policy and compliance will be mandatory.

## Responsibilities and Review

The Board of Directors are responsible for the formulation, implementation and updating this Policy as necessary, and the Company has appointed a dedicated Director, Stephen Roe, to be responsible for the implementation of this policy.

Any concerns are to be reported directly to him or any other Director and they will ensure that the necessary investigations and actions are taken.

All, Company employees and supply chain companies must ensure that they are familiar with this Policy and comply with its requirements.

# Identification Guidance on Slavery and Human Trafficking

Refer to separate guidance document.

Stronger Together

RG fully supports the "Stronger Together — tackling modern slavery in supply chains" campaign.

[www.stronger2gether.org](http://www.stronger2gether.org)

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