

RG Group

Modern Slavery & Human Trafficking Policy

Introduction

RG Group is committed to conducting business ethically, responsibly, and with integrity. We recognise that modern slavery and human trafficking are serious criminal offences and violations of fundamental human rights.

Modern slavery can take a number of forms including slavery, servitude, forced or compulsory labour, and human trafficking. It may involve the exploitation of vulnerable individuals through coercion, threats, deception, or abuse of power.

RG Group has a zero-tolerance approach to modern slavery and is committed to ensuring that such practices do not occur within any part of our organisation or supply chains.

This policy sets out the principles, expectations, and procedures in place to prevent modern slavery and human trafficking within RG Group's operations and those of our suppliers and subcontractors.

This policy supports RG Group's commitment to ethical business practices and compliance with the Modern Slavery Act 2015.

Scope

This policy applies to:

- all employees of RG Group
- directors and senior management
- agency workers and temporary staff
- consultants and advisors
- contractors and subcontractors
- suppliers and service providers
- any individual or organisation working on behalf of RG Group.

The policy applies across all RG Group operations including offices, project sites, and supply chain activities.

Understanding Modern Slavery

Modern slavery refers to situations where individuals are exploited and cannot refuse or leave work because of threats, violence, coercion, deception, or abuse of power.

Examples may include:

- forced or compulsory labour
- human trafficking
- debt bondage
- exploitation of migrant or vulnerable workers
- withholding identity documents or wages
- restrictions on freedom of movement
- threats, intimidation, or coercion in the workplace.

Modern slavery can occur in legitimate industries and supply chains and may not always be immediately visible.

Risk Awareness

RG Group recognises that construction and related industries can present potential risks for labour exploitation due to complex supply chains and the use of subcontracted labour.

Areas of potential risk may include:

- labour supplied through recruitment agencies
- subcontracted labour on construction projects
- temporary or migrant workers
- multi-tiered supply chains
- sourcing of materials or equipment through international suppliers.

Site managers and project leaders are expected to remain vigilant to signs of labour exploitation within site operations and labour supply arrangements.

RG Group is committed to identifying, assessing, and mitigating these risks wherever possible.

Employment Practices

RG Group operates responsible recruitment and employment practices designed to prevent labour exploitation.

Measures include:

- verifying the identity of employees and workers
- carrying out right to work checks in accordance with UK legislation
- ensuring employees provide valid identification documentation
- ensuring employees provide their National Insurance number where applicable
- confirming residential contact details
- ensuring wages are paid directly into an individual's own bank account
- ensuring employees are free to leave employment in accordance with their contractual rights.

Employees are recruited through lawful and transparent processes and are not required to pay recruitment fees to obtain employment with RG Group.

Agency Labour

Where agency labour is used, RG Group works with reputable and established labour providers.

Agencies are expected to:

- comply with all applicable employment and labour laws
- operate ethical recruitment practices
- take appropriate steps to prevent modern slavery
- ensure workers are legally entitled to work.

Where appropriate, labour providers may be required to confirm their compliance with the Modern Slavery Act 2015 and provide details of relevant policies or procedures.

Supply Chain

RG Group works with a range of suppliers, subcontractors, consultants, and service providers.

The majority of these organisations operate within the UK and are therefore subject to UK employment and labour legislation.

However, RG Group recognises that risks may still exist within supply chains and expects suppliers and subcontractors to operate in a responsible and ethical manner.

Suppliers and subcontractors working with RG Group are expected to:

- comply with all applicable labour laws
- ensure workers are treated fairly and with respect
- take reasonable steps to prevent modern slavery within their operations
- cooperate with RG Group in addressing any labour exploitation concerns.

RG Group may undertake appropriate due diligence when selecting suppliers and subcontractors and may review supplier practices where appropriate to identify and address potential modern slavery risks.

Failure to meet these standards may result in corrective action or termination of contractual relationships.

Recognising Signs of Modern Slavery

Employees, managers, and site personnel should remain vigilant for signs that individuals may be victims of labour exploitation.

Indicators may include:

- individuals appearing fearful, withdrawn, or under the control of others
- workers lacking control of their identity documents
- restricted movement or inability to communicate freely
- multiple workers sharing the same address under unusual circumstances
- workers being transported to sites by third parties who control their employment
- signs that wages are being withheld or controlled by others.

These indicators do not necessarily confirm exploitation but should be reported so that concerns can be assessed.

Reporting Concerns

RG Group encourages anyone who suspects modern slavery, labour exploitation, or unethical labour practices to raise concerns as soon as possible.

Concerns may be reported to:

- a line manager
- HR
- a director or senior manager.

Where individuals prefer to raise concerns confidentially, reports may be submitted via the organisation's whistleblowing reporting route.

Email:

whistleblowing@rg-group.org.uk

Reports may also be submitted anonymously where individuals do not wish to disclose their identity.

All reports will be reviewed and investigated appropriately.

Protection for Individuals Raising Concerns

Individuals who report concerns in good faith will not suffer retaliation or detrimental treatment for raising a concern.

Protections for whistleblowers are supported under the Public Interest Disclosure Act 1998.

RG Group will treat reports confidentially wherever possible and will investigate concerns fairly and impartially.

Any victimisation or retaliation against individuals who raise concerns may result in disciplinary action.

Training and Awareness

RG Group will promote awareness of modern slavery risks among employees and those involved in procurement, project management, and labour management.

This may include guidance on:

- recognising signs of labour exploitation
- understanding reporting procedures
- responsible supply chain practices.

Governance and Monitoring

RG Group will review its practices and supply chain relationships periodically to identify potential risks relating to modern slavery.

Where relevant, information relating to modern slavery risks or concerns may be reported to senior leadership or the Board to support governance and oversight.

The organisation will maintain appropriate records of any reported concerns and actions taken.

Significant concerns or identified risks may be escalated to the Board where appropriate.

External Initiatives

RG Group supports wider industry initiatives aimed at preventing labour exploitation within supply chains, including the Stronger Together campaign which promotes responsible recruitment and ethical labour practices.

Related Policies

This policy should be read alongside:

- Whistleblowing Policy
- Equality, Diversity and Inclusion Policy
- Anti-Harassment & Bullying Policy
- Prevention of Sexual Harassment Policy
- Disciplinary Policy
- Data Protection Policy.

Breaches of Policy

Any breach of this policy by employees may result in disciplinary action in accordance with the organisation's Disciplinary Policy.

Breaches by suppliers, subcontractors, or partners may result in investigation and potential termination of contractual arrangements.

Policy Governance

The Board of Directors has overall responsibility for ensuring this policy is implemented and maintained.

Senior management are responsible for ensuring that employees understand and comply with this policy and that concerns are addressed appropriately.

This policy will be reviewed periodically to ensure it remains effective and reflects current legal and organisational requirements.

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