

## **Modern Slavery Statement 2020**

### **Introduction**

This statement is made as part of the RTC Group's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act).

The statement is published in accordance with section 54 of the Act and relates to the financial year ending 31 December 2019. It was approved by the Board of directors on 17 June 2020.

### **Our Organisational Structure and Operations**

RTC Group Plc is an AIM listed recruitment business that focuses on white and blue-collar recruitment, providing temporary and permanent labour to a broad range of industries and customers in both domestic and international markets through its geographically defined operating divisions.

### **UK Division**

Through our Ganymede and ATA Recruitment brands the Group provides a wide range of recruitment services in the UK.

Ganymede specialise in recruiting the best technical and engineering talent and providing complete workforce solutions to help build and maintain infrastructure and transportation for a wide range of UK and international clients. Ganymede is a market leader in providing a diverse range of people solutions to the rail, energy, construction, highways and transportation sectors. With offices strategically located across the country, Ganymede provides its clients with the benefit of a national network of skilled personnel combined with local expertise.

Ganymede tailors its solutions to suit its clients' needs. Whether it's recruiting permanent and temporary technical, engineering and safety-critical or providing fully managed workforce solutions of recruitment, training, account management, contingent labour and fleet provision, Ganymede works closely with its clients to understand their requirements.

ATA Recruitment provides high-quality technical recruitment solutions to the manufacturing, engineering and technology sectors. Working as an engineering recruitment partner supporting businesses across the UK, ATA Recruitment has a strong track record of attracting and recruiting the best engineering talent for our clients. ATA's regional offices which are strategically located in Leicester and Leeds each have dedicated market experts to ensure ATA delivers excellence to both our clients and candidates.

### **International Division**

Internationally, through our GSS brand, we work with customers across the globe that are focused on delivering projects in a variety of sectors. GSS has a track record of delivery in some of the world's most hostile locations. Working closely with its customers GSS provides contract and permanent staffing solutions on an international basis, providing key personnel into new projects and supporting ongoing large-scale project staffing needs. GSS typically recruit across a range of disciplines and skills from operators and supervisors, through to senior management level.

The Group headquarters are located at the Derby Conference Centre which also provides office accommodation for its operating divisions in addition to generating rental and conferencing income from space not utilised by the Group.

The Group has approximately 220 employees based in the UK and has a total annual turnover of circa £95 million.

### **Nature of our Supply Chains**

Our key supply chains comprise of suppliers who provide goods and services to the Group, as well as those who assist us in providing services to our clients such as umbrella companies and workers who provide services via limited companies.

### **Our Policies**

Acting ethically and with integrity remain central to our business dealings and relationships and this ethos is reflected in our Anti-Slavery and Anti-Bribery and Corruption policies. These policies set out our zero-tolerance approach to all forms of modern slavery, bribery and corruption. Our employees are aware of our approach and understand that they are required to adhere to these policies at all times, they also appreciate the importance of highlighting any breach as soon as is reasonably possible.

### **Our Approach**

We understand that our businesses are at risk of being infiltrated by Modern Slavery and Human Trafficking and that combating that risk requires continual efforts on our part. As such we have built on the actions that we took last year to develop further our approach to tackling Modern Slavery. We have targeted more of our resources on our International business as we continue to identify this as the business with the greatest risk of Modern Slavery. Having said that we have also continued our efforts in our other subsidiaries as we are aware that none of our businesses are immune to exploitation. We have detailed below the actions we have taken:

Actions taken specific to Global Staffing Solutions (GSS):

- We have produced a comprehensive Combating Trafficking in Persons (CTiP) general awareness training course to reinforce the policy we introduced last year.
- We have rolled out the above training to all employees, including Site Management Teams.
- We have also introduced a Human Rights Workbook which is read before attending a training session on Human Rights which all employees attend.
- We continue to use our Ethical Recruitment and Workforce Management Charter and have now introduced Ethics training for all employees, including Site Management Teams to ensure they are aware of and adhere to the Charter.
- We commenced a supplier review of all the agencies that we work with which includes amongst other things, all suppliers signing up to our CTiP Policy and confirmation that

their employees who work on our projects have been briefed and will adhere to our Human Rights Policy.

- We have been audited by one of our major clients who reviewed our processes and procedures, including training and CTIP's compliance, passing with their highest rating.
- We continue to use the candidate declaration in our contractors' contractual arrangements, this requires them to confirm that they understand that our services are free to them and that they haven't paid any fees to either GSS or anyone else. They are also given our direct contact details if they have any concerns in relation to their declaration.
- We continue to brief on how to avoid becoming a victim of extortion.
- Our sub agents / suppliers are continuing to be audited by ourselves and approved by our main client(s) following a lengthy due diligence / audit process to ensure they are legitimate and are continuing to adhere to processes;
- We continue to use our New Starter Handbook which includes details of all relevant GSS policies including Anti-Bribery and Corruption and Ethical Recruitment along with a questionnaire to ascertain if the contractor has been dealt with in accordance with our policies;
- Our job adverts continue to detail that no fees will be requested by ourselves or sub-agents, this is then reiterated to operatives throughout the recruitment process;
- We have reviewed our supply chain and identified the high-risk areas that have a greater potential for modern slavery;
- We are continuing to comply with the requirements of CTIP (Combatting Trafficking in Persons); and
- We are continuing to adhere to, the Dhaka Principles [www.dhaka-principles.org/](http://www.dhaka-principles.org/)

#### Actions taken specific to Ganymede Solutions and ATA Recruitment:

- We have audited our umbrella companies to confirm that they are undertaking checks to ensure that temporary workers/contractors are not being subjected to slavery, human trafficking or exploitation;
- We reviewed our placement processes, which include compliance checks and identity checks, to ensure that our workers/contractors are being placed in work voluntarily and our consultants maintain contact with the workers/contractors during their assignment or temporary contract. Our processes are also reviewed in line with changes in legislation and best practice.

Actions taken within the Group as a whole:

- We have recruited a Corporate Social Responsibility Manager, who commenced with us in January 2020, to help us, amongst other things, further develop our strategy on tackling Modern Slavery and Human Trafficking.
- We have registered with Stronger Together to access resources and toolkits;
- We commenced a review of our Anti-Slavery Training which will be developed further, finalised and rolled out in 2020.
- We continue to brief all new employees on our Anti-Slavery Policy at their induction;
- Our employees are advised to raise any concerns regarding human trafficking and exploitation, no matter how insignificant they feel they may be;
- We continue to keep our Anti-Slavery Policy under review to ensure that it is relevant and up to date.

#### **Further Action**

We understand that eradicating the risk of exploitation within our Group and our supply chain is an ongoing task and therefore we must not rest on our laurels, as such we intend to undertake the following steps over the next 12 months:

- To continue to develop the action plan to reduce high risks within the GSS supply chain;
- Finalise the revised Anti-Slavery training;
- Provide refresher training for all employees further raising the profile of Modern Slavery and Human Trafficking risks to our businesses;
- Continue to review the Stronger Together toolkits and other resources to ensure that we are utilising the most up to date processes and procedures to help to eliminate Modern Slavery.
- Continue to provide adequate resources to implement effectively our Anti-Slavery policy and procedures; and
- Introduce key performance indicators to monitor the effectiveness of our steps.

A handwritten signature in black ink, appearing to read "Bill Douie", is written over a horizontal line.

Bill Douie  
Chairman  
17 June 2020