# Anti-Slavery and Human Trafficking Statement (2017)

## Introduction

RTC Group is committed to preventing slavery and human trafficking occurring in any of its corporate activities, as well as seeking to ensure that our supply chains are also free from such practices.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and sets out the steps we have taken to ensure that our business as well as our supply chains are free from slavery and human trafficking during the financial year ending 31 December 2016. It was approved by the board of directors on 21 June 2017.

## **Our Organisational Structure and Operations**

RTC Group Plc is an AIM listed recruitment business that focuses on white and blue collar recruitment, providing temporary, permanent and contingent staff to a broad range of industries and clients in both domestic and international markets through our subsidiary companies.

The Group has approximately 180 employees all based in the UK, and our headquarters are housed in The Derby Conference Centre, Derby, England.

We have three principal trading subsidiaries engaged in the recruitment of human capital resources and the provision of managed services, these being; ATA Recruitment, Ganymede Solutions and Global Staffing Solutions.

ATA is one of the UK's leading engineering and technical recruitment consultancies. Supplying white and blue collar engineering and technical staff to a broad range of SME clients and vertical markets, mainly in the UK.

Ganymede is focussed on the supply and operation of blue collar contingent labour into safety critical markets in the UK.

Global Staffing Solutions predominantly provides managed service solutions for international clients based overseas.

We have a total annual turnover of c.£70m.

### Nature of our Supply Chains

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

### **Our Policies**

Our Anti-Slavery and Anti-Bribery and Corruption policies reflect our commitment to acting ethically and with integrity in all our business dealings and relationships and they set out our zero-tolerance approach to all forms of modern slavery and bribery and corruption. Our polices are established by our senior leadership team based on advice from HR, industry bodies and our legal advisers. We review our policies on a regular basis or as needed to adapt to changes.

### **Our Approach**

As part of our approach to tackling the risk of slavery and human trafficking we have undertaken the following relevant steps:

- We have reviewed the businesses within the Group and identified our international business, Global Staffing Solutions, as the business with the greatest potential of modern slavery. Global Staffing Solutions is adhering to, and will continue to adhere to, the Dhaka Principles <u>www.dhakaprinciples.org/</u> to help minimise such risks.
- We have undertaken an audit of our umbrella companies to understand what checks they carry out to ensure that temporary workers/contractors are not being subjected to slavery, human trafficking or exploitation;
- We have in place, and work to, robust placement processes which include compliance checks and identity checks;
- We have produced an Anti-Slavery Policy which has been rolled out to all employees;
- We have nominated an individual within the business to take responsibility for overseeing the implementation of the policy and annual preparation of the Anti-Slavery and Human Trafficking statement;
- We have reviewed our Whistleblowing Policy to ensure it includes the reporting of modern slavery issues within the business and supply chains; and
- We have reviewed and are proposing to update relevant standard agreements we have with umbrella companies to ensure they have an obligation to comply with our Modern Slavery Policy.

#### **Further Action**

We understand that there is an ongoing risk of modern slavery and human trafficking and our efforts to ensure that this does not occur within our Group or supply chains must be continual, as such it is our intention to undertake the following steps over the next 12 months:

- Ensuring that all new employees are fully aware of our Anti-Slavery Policy during their induction;
- Commencing an internal awareness / training programme with targeted training for those involved in procurement and/or with responsibility for supply chain management;
- Initiating a risk assessment, mapping our supply chains and identifying high risk areas that have a greater potential of modern slavery;
- Providing adequate resources to effectively implement our Anti-Slavery policy and procedures; and
- Introducing key performance indicators to monitor the effectiveness of our steps.

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Bill Douie Chairman Date 21 June 2017