

Modern Slavery Statement 2021

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 2020. It was approved by the board of directors on 16 June 2021.

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 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, keeping their goals in mind every step of the way.

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 188 employees based in the UK and has a total annual turnover of circa £81 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 payroll companies and workers who provide services via limited companies.

Our Policies

Our commitment to acting ethically and with integrity in all our business dealings and relationships continues. This is demonstrated by our zero-tolerance approach to modern slavery, bribery and corruption and is further reflected in our Anti-Slavery and Anti-Bribery and Corruption policies. Our employees are briefed/trained on these policies at induction and are made aware of our zero-tolerance approach. They understand that they are required to adhere to our policies at all times and are made aware of the importance of highlighting any breach of our policies as soon as is reasonably possible.

Our Approach

We are acutely aware that our businesses are at risk of being infiltrated by Modern Slavery and Human Trafficking and as such we undertake on-going efforts and actions to combat that risk. We seek to build on and further develop the actions we have previously undertaken to tackle Modern Slavery.

We continue to see our International business (GSS) as the business with the greatest risk of being infiltrated by Modern Slavery and Human Trafficking, however each business has its own risks and threats and therefore they target their resources to seek to combat those risks. We have detailed below the actions we have taken:

Actions taken specific to GSS:

- We have undertaken refresher training on Combating Trafficking in Persons (CTiP) to reaffirm our Combatting Trafficking in Persons policy.
- We have displayed posters in all our offices detailing the modern slavery and human trafficking key indicators/warning signs and what to do in the event that these are observed.
- We continue to issue the Human Rights Workbook which is read before attending a training session on Human Rights which all employees are required to attend.
- We continue to use our Ethical Recruitment and Workforce Management Charter, training all employees on what is expected of them.

- We continue to use our robust process to review new suppliers which includes amongst other things, all suppliers signing up to our CTiP Policy and confirmation that their employees working on our projects have been briefed and will adhere to our Human Rights Policy.
- 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 in the supply chain. 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).
- We are continuing to adhere to the Dhaka Principles www.dhaka-principles.org/

Actions taken specific to Ganymede Solutions and ATA Recruitment:

- We have provided recruitment specific modern slavery training (produced by Stronger Together) for all our employees.
- We have further raised awareness of modern slavery, through our induction training, and modern slavery policy statement.
- We have reviewed our supply chain to identify which suppliers are high risk in terms of modern slavery entering our supply chain.
- We have determined that our Labour Suppliers are high risk and as such we are introducing additional safeguards in relation to these suppliers.

- We have been utilising Stronger Together's toolkits to enable us to introduce best practice throughout the business which has highlighted the need to introduce the following:
 - A Responsible Recruitment Policy – to detail our commitment to recruiting responsibly and never charging fees for our services (which was produced in early 2021).
 - Compliant Recruitment Principles document - which all employees involved in the recruitment or deployment of temporary workers are required to sign up to (which was produced in early 2021).
 - Additional modern slavery questions in our Approved Supplier Process to pre-screen prospective suppliers in relation to the effectiveness of their existing safeguarding controls and practises in relation to preventing modern slavery occurring within their organisation (which were introduced in early 2021).
- We only use FSCA accredited payroll companies which requires businesses to confirm steps taken to prevent slavery and exploitation within their supply chain.
- We continue to work to robust placement processes which include compliance checks and identity checks, these processes are reviewed in line with changes in legislation and best practice.

Actions taken within the Group as a whole:

- We have been utilising Stronger Together to access resources and toolkits;
- We have reviewed the effectiveness of our non-recruitment anti-slavery training and will roll out refreshed training in 2021.
- We continue to brief all new employees on our anti-slavery policy at their induction;
- Our employees are reminded of the need to raise any concerns regarding human trafficking and exploitation, no matter how insignificant they feel they may be;
- We have reviewed the Group's approach to modern slavery and human trafficking and determined that as each business has differing risks and approaches to dealing with modern slavery, from 2021 each business will produce and update their own anti-slavery policy.

Further Actions

We understand that despite all the work we have already undertaken, the risk to our Group and supply chain is ever present and our journey to eradicate that risk must be continuous. We will therefore continue to develop processes and procedures to help protect us from that risk. As such we intend to undertake the following steps over the next 12 months:

- Further assess the risks to our business to determine which parts of our Group are most at risk from modern slavery.

- Review contractual arrangements with suppliers in relation to specific prohibition against slavery or servitude, the use of forced, compulsory or trafficked labour and the use of child labour in line with our policies.
- Set up a modern slavery steering group to review the actions we have taken to date and identify and implement further best practise using the Stronger Together resources.
- Seek volunteers from within the businesses to become modern slavery champions to help further raise awareness of modern slavery to our employees, workers and contractors and promote the different ways workers can report concerns or suspicions of exploitation.
- Develop key performance indicators to monitor the effectiveness of our actions.
- Provide refresher training for all employees further raising awareness of modern slavery and Human Trafficking risks to our businesses.
- Continue to utilise 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 effectively implement anti-slavery policy and procedures.

A handwritten signature in black ink, appearing to read "Bill Douie", is written over a large, light grey, stylized signature line.

Bill Douie
Chairman
22 June 2021