

Anti-Slavery and Human Trafficking Statement (2018)

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 2017. It was approved by the board of directors on 20 June 2018.

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 190 employees 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 (GSS).

ATA supplies recruitment solutions to the engineering, technical and manufacturing sectors within the UK, and has two core operating units – projects and branches. Projects supply to major infrastructure and transport projects whilst the branch network is focused on supporting local manufacturing and engineering companies.

Ganymede supplies labour into safety critical environments. Its core business is the supply and operation of contingent labour within the rail industry. Additionally, Ganymede Energy is a UVDB accredited specialist engineering recruiter focused on providing domestic and commercial gas and electrical engineers.

GSS is a staffing solutions provider with a track record of delivery in some of the world's most hostile locations. GSS works with clients across the globe offering contract and permanent staffing solutions on an international basis, providing key personnel into new projects and supporting ongoing large-scale project staffing needs.

In addition to our recruitment subsidiaries, we have the Derby Conference Centre which provides first class accommodation for our Group Headquarters in addition to generating rental and conferencing income from space not utilised by the Group.

We have a total annual turnover of c.£72m.

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

We are committed to acting ethically and with integrity in all our business dealings and relationships, this commitment is reflected in our Anti-Slavery and Anti-Bribery and Corruption policies which set out our zero-tolerance approach to all forms of modern slavery, bribery and corruption. All our employees are required to adhere to these policies and highlight any breach at the earliest opportunity.

Our Approach

We understand that combating the risk of Modern Slavery requires continual efforts and 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 our resources on our International business as we have identified this as the business with the greatest risk of Modern Slavery. We have also continued our efforts in our other subsidiaries as we cannot stand still in our attempt to eliminate exploitation. We have detailed below the actions we have taken:

Actions taken specific to Global Staffing Solutions:

- All our sub agents / suppliers are audited by ourselves and approved by our main client(s) following a lengthy due diligence / audit process to ensure they are legitimate and adhering to processes;
- We have introduced a 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;
- We have developed our Ethical Recruitment and Workforce Management Charter which clearly states:
 - We never charge contractors fees for recruitment services, either directly or indirectly;
 - We provide clear and fair contracts which are translated into the contractors' native language if required;
 - We take measures to ensure the safe working conditions for our contractors with access to medical facilities and training on Health and Safety;
 - We pay wages on time, directly to the contractor; and
 - We ensure our contractors have safe, decent and sanitary living conditions with access to potable water and dining or cooking facilities.
- 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/

Actions taken specific to ATA Recruitment and Ganymede Solutions:

- A further audit of our umbrella companies has occurred to confirm that they are undertaking checks to ensure that temporary workers/contractors are not being subjected to slavery, human trafficking or exploitation;
- We continue to work to robust placement processes which include compliance checks and identity checks;

Actions taken within the Group as a whole:

- All new employees have been fully briefed on our Anti-Slavery Policy at their induction;
- Our employees have been advised to raise any concerns regarding human trafficking and exploitation, no matter how insignificant they feel they may be;
- We have reviewed our Anti-Slavery Policy, taking into account how it has been operating since its implementation in 2016;

Further Action

We understand that despite our actions above there is still more work to be done to reduce the risk of modern slavery and human trafficking within our Group and our supply chains. We acknowledge that our efforts must be continual and as such we intend to undertake the following steps over the next 12 months:

- Review the training provided to new employees to ensure effectiveness;
- Produce a briefing / training session to help employees spot the signs of human trafficking;
- To continue to develop the action plan to reduce high risks within the GSS supply chain;
- 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 blue ink, appearing to read "Bill Douie".

Bill Douie
Chairman
Date 20 June 2018