



Modern Slavery Statement 2022

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 2021. It was approved by the board of directors on 1 June 2022.

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 roles 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 176 employees based in the UK and has a total annual turnover of circa £78 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 and this commitment is reinforced through our various policies and procedures including our Anti-Slavery and Anti-Bribery and Corruption policies. Our zero-tolerance approach to modern slavery and bribery and corruption is explained to our employees at induction, this awareness is then strengthened through more detailed training and refreshed regularly. Our employees are aware of the need to adhere to our policies at all times and understand the importance of highlighting any breach of policy as soon as is reasonably possible.

Our Approach

We acknowledge that our businesses are at risk of being infiltrated by modern slavery and human trafficking and to help reduce that risk we undertake on-going efforts and actions to combat such risks. Year on year we seek to build on and further develop the actions we have previously undertaken to tackle modern slavery.

As stated in previous Modern Slavery Statements we see our International business (GSS) as the business with the greatest risk of being infiltrated by modern slavery and human trafficking, having said this, each business has its own risks and threats and therefore they target their resources in various ways to seek to combat their main 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 our contractors 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/

- We have introduced Compliant Recruitment Principles which all employees have signed up to.
- We have provided recruitment specific modern slavery training (produced by Stronger Together).

Actions taken specific to Ganymede and ATA Recruitment:

- We have been utilising Stronger Together's toolkits to enable us to introduce best practice throughout the business and in 2021 we introduced the following:
 - A Responsible Recruitment Policy – to detail our commitment to recruiting responsibly and never charging fees for our services.
 - Compliant Recruitment Principles document - which all employees involved in the recruitment or deployment of temporary workers are required to sign up to.
 - 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.
- We have provided recruitment specific modern slavery training (produced by Stronger Together) for all our direct employees.
- We have further raised awareness of modern slavery, through our induction training, and modern slavery policy statement.
- We only use FSCA accredited payroll companies which require 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 introduced a modern slavery steering group which meets quarterly to review the actions we have taken to date and identify and implement further best practise.
- Our modern slavery steering group members have attended training delivered by the Supply Chain Sustainability School.
- We continue to utilise a number of resources including Stronger Together and the Supply Chain Sustainability School to help support the actions of the modern slavery steering group.
- We have sought volunteers from within the Group 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. Our modern slavery champions meet quarterly to identify activities and review the effectiveness of previous actions.
- We have reviewed the effectiveness of our non-recruitment modern slavery training and will roll this out in 2022.
- We have drafted individual Anti-Slavery Policy's for each business with a plan to roll them out in 2022.
- 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.

Further Actions

The actions we have taken will continue into 2022 and beyond as the risk to our Group and supply chain is ever present and as such our journey to mitigate that risk must be continuous. This being the case we will continue to develop our policies, processes and procedures to seek to protect us from that risk. We therefore intend to undertake the following steps over the next 12 months (January to December 2022):

- Introduce internal modern slavery KPI's to help us monitor the progress we are making such as:
 - Percentage of direct employees given a modern slavery overview within the first eight weeks of employment.

- Percentage of direct employees given modern slavery training within the first six months of employment. Percentage of direct employees given refresher training each year.
 - Review each Anti-slavery Policy at least annually.
 - Undertake at least four modern slavery steering group meetings each year to ensure we are keeping up to date with best practice and moving forward with our actions.
 - Undertake at least four modern slavery champions meetings each year to continue to raise awareness of modern slavery throughout the Group.
- Roll out individual business Anti-Slavery Policies.
 - Carry out a supply chain risk assessment for each business and map the supply chain for high risk businesses to ensure our actions are focused on our greatest risks.
 - Undertake a modern slavery audit of high-risk suppliers, including understanding their modern slavery policies and procedures.
 - 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.
 - Review and update internal modern slavery training, providing refresher training for all employees further raising awareness of modern slavery and human trafficking risks to our businesses.
 - Ganymede will complete the GOV.UK Modern Slavery Assessment Tool (MSAT) and implement actions to further improve their score.
 - Continue to utilise Stronger Together and Supply Chain Sustainability School toolkits and other resources to ensure that we are utilising the most up to date resources to help to eliminate the risk of modern slavery.
 - Continue to provide adequate resources to effectively implement our anti-slavery policies and procedures.



Bill Douie
Chairman
1 June 2022