



Modern Slavery Statement 2024

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 2023. It was approved by the board of directors on 19 June 2024.

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 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 our clients with the benefit of a national network of skilled personnel combined with local expertise.

Ganymede tailors its solutions to suit its customers' 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 customer to understand their requirements, keeping their goals in mind every step of the way.

ATA 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 has a strong track record of attracting and recruiting the best engineering talent for our customers. 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 customers 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.

Group Headquarters

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 196 employees based in the UK and has a total annual turnover of circa £99 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 is fundamental to all our business dealings. This approach is strengthened through our various policies and procedures including our Modern Slavery and Anti-Bribery and Corruption policies. Our zero-tolerance approach to all forms of modern slavery and bribery and corruption are explained to our employees at induction and then reinforced through more detailed training which is refreshed regularly. We require all our employees to adhere to our policies and procedures and they are keenly aware of the need to highlight any breach of policy or concerns they may have as soon as is reasonably possible.

Our Approach

We recognise the ongoing threat of modern slavery and human trafficking to our businesses and acknowledge that addressing this risk demands continuous and proactive measures. Accordingly, we are committed to enhancing and expanding our previous initiatives to strengthen our approach to combat modern slavery.

We identify our International business (GSS) as the business most vulnerable to modern slavery and human trafficking. However, we recognise that each of our businesses faces unique risks and threats. Consequently, each business allocates its resources to address its specific challenges. Below, we outline the measures we have implemented:

Actions taken specific to GSS:

- We have carried out a Supplier Risk assessment in relation to Modern Slavery, and have identified our highest-risk suppliers.
- We have undertaken a Supplier Review with those identified as at highest risk, part of the review involved assessing their Modern Slavery policies, practices and procedures.
- We have updated our Supplier Questionnaire to include specific questions relating to Modern Slavery.
- We are continuing to comply with the requirements of CTiP (Combatting Trafficking in Persons).
- 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 have rolled out refresher training on Combating Trafficking in Persons (CTiP) to reaffirm our Combating Trafficking in Persons 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.
- 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 Contractor Handbook which includes details of all relevant GSS policies including Anti-Bribery and Corruption, Modern Slavery 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.
- Our website has been updated to clearly state that GSS will never charge for recruitment services.
- We have introduced Compliant Recruitment Principles which all employees have signed up to.
- We have provided modern slavery refresher training for all employees.

- We have produced and rolled out our GSS specific Modern Slavery Policy to all employees and contractors.
- We have revised our website to include dedicated Modern Slavery resources.
- We have developed a scoring system to assess high-risk suppliers' approach to Modern Slavery and to help suppliers identify areas for improvement.

Actions taken specific to Ganymede and ATA:

- We have continued our detailed Modern Slavery Risk Assessment of our suppliers which will be completed in early 2024.
- We have carried out a Business Integrity and Ethics audits on some of our key suppliers.
- We have started to develop a process for carrying out spot check audits within our supply chain to ensure suitable right to work checks are being completed.
- We have started the development of our Code of Business Ethics which aims to outline our ethical business practices including our commitment to preventing Modern Slavery.
- We have achieved certification to the Achilles Ethical Business Programme.
- We continue to work to our Responsible Recruitment Policy which details our commitment to recruiting responsibly and never charging fees for our services.
- All employees involved in the recruitment or deployment of temporary workers are required to sign up to our Compliant Recruitment Principles.
- All potential suppliers are pre-screened through our Approved Supplier Process which includes questions in relation to their existing safeguarding controls and practices in relation to preventing modern slavery occurring within their organisation.
- We have provided modern slavery training for all directly employed new starters and refresher training for our current 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:

- Our modern slavery steering group continues to meet quarterly to review the actions we have taken to date including reviewing progress against our KPI's, and identifying and implementing further best practise.
- Our modern slavery steering group members have undertaken further training delivered by the Supply Chain Sustainability School.
- We continue to utilise a number of resources including the Supply Chain Sustainability School and Stronger Together to help support the actions of the modern slavery steering group and champions.
- Our modern slavery champions meet quarterly to identify activities to help raise awareness of modern slavery to our employees, workers and contractors and promote the different ways concerns can be reported along with suspicions of exploitation.
- Our direct employees have undertaken refresher training on modern slavery.
- We continue to brief all new employees on our Modern 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

We understand that eliminating the risk of exploitation within our Group and across our supply chain is an ongoing challenge, necessitating continuous efforts. With this in mind, we are committed to implementing the following steps over the next 12 months (January to December 2024):

- Monitor our progress against our modern slavery KPI's and ensure actions are taken to achieve these.
- Roll out the revised business specific Modern Slavery Policies to the Derby Conference Centre and RTC Group Central Services.
- Progress our supply chain risk assessments in each business, highlighting our highest risk suppliers and focusing our actions on our greatest risks.

- 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 recruiter specific modern slavery training, providing refresher training for all employees further raising awareness of modern slavery and human trafficking risks to our businesses.
- Ganymede will maintain certification to the Achilles Ethical Business Programme.
- Ganymede will implement a Modern Slavery Audit that will be rolled out to all suppliers identified as high risk following completion of the risk assessment.
- Ganymede will review and re-submit the Modern Slavery Assessment Tool (MSAT) in order to further improve their score.
- Ganymede will introduce Supplier specific KPI's in order to track and monitor progress against any audit findings.
- GSS employees will undertake US Department of Defence Combatting Trafficking in Persons (CTiP) training.
- GSS will display CTiP posters in prominent locations at it's offices.
- GSS will develop and 'Open Door' Policy for reporting instances of Modern Slavery.
- GSS will continue to rollout Combatting Trafficking in Persons (CTiP) training to its high risk suppliers.
- Continue to utilise Supply Chain Sustainability School and Stronger Together toolkits and other resources to ensure that we are utilising the most up to date resources to help eliminate the risk of modern slavery.
- Continue to provide adequate resources to effectively implement our Modern Slavery policies and procedures.



Andy Pendlebury
 Executive Chairman and Chief Executive
 19 June 2024