



Modern Slavery Statement 2026

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 2025. It was approved by the board of directors on 17 June 2026.

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 to the following sectors in the UK.

- Rail
- Energy and utilities
- Manufacturing and engineering
- Water and environment
- Transportation
- Highways
- Construction

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 customers. 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 customers 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 is 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 customers 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 202 direct employees based in the UK and has a total annual turnover of circa £96 million.

Nature of our Supply Chains

Our supply chains comprise both labour supply chains and the procurement of goods and services required to support our operations.

Within our recruitment businesses (Ganymede Solutions and GSS), our primary supply chain is the sourcing and supply of labour. This includes directly engaged workers and candidates, labour providers, subcontractors, umbrella companies, limited company contractors and other intermediaries that support the delivery of recruitment services to our clients in the UK and internationally. In addition, we have suppliers that support us with our fleet requirements.

Within our hotel/conference centre operations, our supply chain includes suppliers of food and beverages, maintenance contractors, kitchen equipment suppliers, utilities, office equipment, furniture, laundry services, IT equipment and other operational goods and services required to support hospitality and property management activities.

Across the Group, our support functions, including Human Resources, Information Technology and Finance, engage a range of professional service providers, software and technology vendors, training providers, consultants and other business support suppliers.

We recognise that modern slavery risks may arise within both labour supply chains and the supply chains for goods and services. We therefore seek to identify, assess and manage these risks through various means including risk assessments, supplier due diligence, contractual controls, training and ongoing monitoring activities.

Our Policies

We are committed to conducting our business with the highest standards of ethics and integrity, this commitment is reflected in our established policies and procedures, including our Modern Slavery Policy, Anti-Bribery and Corruption Policy and Whistleblowing Policy, which set out our expectations for responsible and lawful conduct.

We maintain a zero-tolerance approach to modern slavery, bribery, and corruption in any form. These principles are communicated to all employees during their induction and are reinforced through regular training to ensure ongoing awareness and understanding.

All employees are required to comply with our policies and procedures and to uphold our ethical standards at all times. They are also expected to report any concerns or suspected breaches promptly, enabling us to take appropriate action without delay.

We recognise that modern slavery risks are not uniform across our operations or supply chains. The nature and level of risk varies according to factors such as geography, sector, workforce characteristics, recruitment practices and the use of third party suppliers and labour providers.

As a recruitment business, our principal modern slavery risks arise within labour supply chains, particularly where temporary, contingent or subcontracted labour is utilised. Additional risks may arise where recruitment activities are undertaken internationally, where international intermediaries are involved in the recruitment process, or where workers may be vulnerable due to language barriers, migration status or economic circumstances.

Within our conference centre and support function operations, risks may arise through the procurement of goods and services, particularly where suppliers source products or materials through complex domestic or international supply chains that may present a heightened risk of worker exploitation.

To identify and manage these risks, we undertake risk assessments across our operations and various supply chains. These assessments consider factors including geography, sector, workforce profile, recruitment methods, supplier relationships and any intelligence obtained through audits, questionnaires, worker feedback or reported concerns.

Each operating business undertakes risk assessments, enabling resources and due diligence activities to be focused on those areas presenting the greatest risk.

Our Approach

We recognise our businesses are at risk of modern slavery and human trafficking, and we understand that effectively mitigating these risks requires ongoing vigilance and a proactive approach. We are therefore committed to continually reviewing and strengthening our existing practices, building on previous initiatives to enhance our efforts in combatting modern slavery.

Through our risk assessment processes, we have identified our international recruitment business (GSS) as presenting the highest potential exposure to modern slavery risks. This is due to the nature of international labour supply chains, the use of overseas recruitment partners and the jurisdictions in which services may be provided.

We recognise, however, that modern slavery risks can arise across all areas of the Group. Accordingly, each business undertakes periodic risk assessments, enabling risks to be identified, monitored and addressed through proportionate controls and due diligence activities.

Due Diligence

We apply a risk-based approach to due diligence across our operations and supply chains. Depending on the level of risk identified, our due diligence activities may include supplier onboarding checks, modern slavery questionnaires, contractual commitments, accreditation reviews, audits, right-to-work verification processes, worker engagement activities and ongoing supplier monitoring.

Where suppliers or labour providers are identified as presenting a higher level of risk, enhanced due diligence measures may be undertaken, including more detailed assessments, follow-up reviews and targeted audits.

We expect our suppliers, labour providers and business partners to share our commitment to ethical business practices and to take appropriate steps to prevent modern slavery within their own operations and supply chains.

Governance

The Board retains ultimate responsibility for overseeing the Group's approach to preventing modern slavery. Operational oversight is supported by the Modern Slavery Steering Group, which meets quarterly to review risks, monitor progress against objectives, assess the effectiveness of controls and identify opportunities for continuous improvement.

The Steering Group is supported by Modern Slavery Champions who promote awareness, support training initiatives and encourage the reporting of concerns in their area of the Group.

Members of the Modern Slavery Steering Group have responsibility for different areas of the Group's operations and supply chains. Steering Group members gather and review information relating to modern slavery risks, due diligence activities, training, supplier engagement, governance and performance within their respective areas of responsibility.

This information is collated by the Steering Group to inform the preparation of the Group's annual Modern Slavery Statement. The draft statement is reviewed by the Board to ensure it

reflects the actions taken, and future commitments of the Group. The statement is then formally approved by the Board prior to publication.

Reporting Concerns and Remediation

We encourage employees, workers, contractors, suppliers and other stakeholders to report concerns relating to modern slavery, human trafficking or worker exploitation through our established reporting channels.

Where concerns are identified, we seek to take a victim-centred approach and investigate matters promptly and appropriately. Our approach to remediation involves supporting affected individuals, engaging relevant stakeholders and implementing corrective actions where necessary.

Actions taken

Each business is responsible for assessing its particular risks and allocating appropriate resources to address them effectively. The measures implemented across our organisation to manage and mitigate these risks are outlined below:

Actions specific to GSS:

- We carry out an annual Modern Slavery Risk Assessment on our supply chain and have developed a scoring system to assess high-risk suppliers' approach to modern slavery and to help suppliers identify areas for improvement.
- We use our Supplier Questionnaire which includes specific questions relating to modern slavery as part of our new supplier due diligence.
- We comply with the requirements of CTiP (Combatting Trafficking in Persons).
- We 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.
- Our employees have undertaken US Department of Defence Combatting Trafficking in Persons (CTiP) training.
- We use a 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 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.
- We detail an alert on our website home page highlighting to job seekers that false job offers are prevalent in the International Job Market, we reiterate that GSS never charge for recruitment services and provide an email for job seekers to use to check if a vacancy is genuine.
- We work to our Compliant Recruitment Principles which all employees have signed up to.
- We have provided modern slavery refresher training for all employees.
- Our Modern Slavery Policy continues to be reviewed and updated annually and is available on our website.
- Our website includes a dedicated modern slavery page which details our zero tolerance approach to all forms of modern slavery.
- We promote our "Open Door" Policy for reporting instances of modern slavery.
- We display CTiP posters in prominent locations at our offices.
- We have enhanced our Contractor Feedback Questionnaire by incorporating specific questions relating to modern slavery. Additionally, the questionnaire has been transitioned to an online format to improve accessibility and increase response rates.
- We have established a Worker Communications Portal which, amongst other things, can be used to share modern slavery resources and support.

Actions taken specific to Ganymede and ATA:

- We have progressed with our detailed Modern Slavery Risk Assessment in relation to our suppliers and have reviewed modern slavery due diligence questionnaires sent to those suppliers identified as high risk. This allows us to further evaluate their modern slavery approach and processes in greater detail. In addition, we have reviewed and updated our Risk Assessment process and plan to implement this in 2026.

- We have developed a process for carrying out spot check audits within our supply chain to ensure suitable right to work checks are being completed.
- We have launched our Code of Business Ethics which outlines our ethical business practices including our commitment to preventing modern slavery.
- We work to our Responsible Recruitment Policy which details our commitment to recruiting responsibly and never charging fees for our services and requiring that workers are not charged recruitment or placement fees, either directly or indirectly through any third party in the supply chain.
- 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 provide 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 and 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 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.
- We joined the FCSA Recruiter Partner Network, strengthening our commitment to excellence in recruitment and compliance. As part of the FCSA Recruiter Partner Charter, we adhere to a clear framework that ensures the highest standards in recruitment practices and supply chain compliance.
- We achieved the Workforce Assured accreditation which is a new scheme designed specifically for the labour supply chain, built around a tailored audit that strengthens compliance and drives better temporary workforce management practices. It sets a clear standard for our industry and focuses on continuous improvement to reduce risk.
- To outline the procedures for remediation if modern slavery is suspected or identified, we have implemented a "Remediation Policy Following a Suspected Instance of Modern Slavery" document.

Actions within the Group as a whole:

- We have reviewed the updated Home Office statutory guidance on transparency in supply chains and are taking a proportionate, risk-based approach to strengthening our management of modern slavery risks, informed by its principles. We remain committed to continuous improvement, alongside enhancing transparency and taking appropriate action across our operations and supply chains over time.
- Our Modern Slavery Steering Group continues to meet quarterly to review the actions we have taken to date including reviewing progress against our KPIs, and identifying and implementing further best practice.
- Our Modern Slavery Steering Group members have undertaken further training delivered through 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 Modern Slavery Champions promoted Anti-Slavery week (13-17 October 2025) by sharing a short infographic each day, highlighting key facts, warning signs, and ways we can all help combat modern slavery.
- Our direct employees have undertaken refresher training on modern slavery, with Stronger Together Recruiter specific training given to relevant employees.
- We brief all new direct 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.
- We have launched a Modern Slavery Communications Workspace on our company HR system, creating a central hub for resources and updates that improves awareness and supports a more coordinated approach to tackling modern slavery.
- We promote accessible reporting channels to all employees, workers and contractors.
- We continue to monitor our performance against internal key performance indicators, including:
 - The percentage of direct employees receiving an overview of modern slavery within their first 8 weeks of employment

- The percentage of direct employees completing modern slavery training within their first 6 months of employment
- The percentage of direct employees completing annual modern slavery refresher training
- The annual review of our Modern Slavery Policy
- Quarterly meetings of our Modern Slavery Steering Group
- Quarterly meetings of our Modern Slavery Champions

Further Actions

We understand that identifying, mitigating, and addressing the risk of exploitation within our Group and supply chains is an ongoing endeavour that requires continuous review and improvement. In support of this commitment, we intend to undertake the following actions during the next reporting period (January to December 2026):

- Continue to monitor our progress against our modern slavery KPIs and ensure actions are taken to achieve these.
- Continue to review and where necessary update company specific Modern Slavery Policies.
- Progress our supply chain risk assessments in each business, highlighting our highest risk suppliers and focusing our actions on our greatest risks.
- Provide general modern slavery training to all direct employees to continue to raise awareness of modern slavery and human trafficking risks to our businesses.
- 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.

Company Specific Actions:

- GSS employees will undertake US Department of Defence Combatting Trafficking in Persons (CTiP) training on an annual basis.
- GSS will continue to rollout Combatting Trafficking in Persons (CTiP) training to high risk suppliers.
- Ganymede will introduce Supplier specific KPIs in order to track and monitor progress against any audit findings.

- Ganymede will implement an updated Risk Assessment process.
- Ganymede will maintain certification to the Workforce Assured Accreditation.

A handwritten signature in grey ink, appearing to read 'Andy Pendlebury', with a large, stylized flourish at the end.

Andy Pendlebury
Executive Chairman and Chief Executive
17 June 2026