

## Anti-Slavery and Human Trafficking Statement (2019)

### 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 2018. It was approved by the Board of Directors on 19 June 2019.

### Our Organisational Structure and Operations

RTC Group Plc is an AIM listed engineering and technical recruitment business that provides temporary and permanent labour to a broad range of industries and customers in both domestic and international markets through its subsidiary companies.

The Group has approximately 210 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 and technical sectors. It 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. ATA's main operating sectors are civil engineering, rolling stock, highways, rail infrastructure, facilities management and maintenance, specialist equipment manufacturing, technology, process and FMCG industries.

Ganymede supplies labour into safety critical environments. Its core business is the supply and operation of temporary labour within the rail industry. As a RISQS approved supplier, Ganymede is a leading provider of blue and white collar skilled and semi-skilled labour, safety critical personnel and technical staff on call-off and temporary contracts. Additionally, Ganymede Energy is a UVDB accredited specialist engineering recruiter focused on providing domestic and commercial gas and electrical engineers. Ganymede also provides and manages temporary labour within the construction, infrastructure, highways, general civil engineering and utilities sectors.

GSS is a staffing solutions provider with a track record of delivery in some of the world's most hostile locations. GSS works with customers across the globe that are focused on delivering projects in a variety of engineering sectors. 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.

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 circa £88 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 umbrella 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 echoed in our Anti-Slavery and Anti-Bribery and Corruption policies. These 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 are acutely aware that our businesses are at risk of being infiltrated by Modern Slavery and Human trafficking and as such we continue to review this risk and build on the actions we have taken since our journey to tackle Modern Slavery began. We have again focused our efforts and resources on our International business as this business has been identified as the one at greatest risk of Modern Slavery. Having said that, we have also strengthened our efforts in our other subsidiaries as we will not stand still in our attempt to eliminate exploitation. We have detailed below the actions we have taken this year:

Actions taken specific to Global Staffing Solutions:

- We have implemented a new Combating Trafficking in Persons (CtiP) Policy into all our supplier contracts, this details our zero tolerance on trafficking; what the supplier and its employees are required to do and what they are prohibited from doing, along with the consequences of failing to adhere to the policy.
- Our employees and a number of our contractors and sub-agents have completed an online anti-corruption training module provided by TRACE International which covered Human Trafficking.
- We have introduced a candidate declaration into 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. They are also given our contact details if they have any concerns in relation to their declaration.
- We have also produced and issued a briefing 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;

- We continue to use 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/](http://www.dhaka-principles.org/)

#### Actions taken specific to ATA Recruitment and Ganymede Solutions:

- We have introduced an annual audit of our umbrella companies 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, these processes are reviewed in line with changes in legislation and best practice;

#### Actions taken within the Group as a whole:

- All new employees are being briefed on our Anti-Slavery Policy at their induction;
- Our employees are advised to raise any concerns regarding human trafficking and exploitation, no matter how insignificant they feel they may be;
- We continue to keep our Anti-Slavery Policy under review to ensure that it is relevant and up to date.

## Further Action

We are aware that although we continue to introduce new policies and processes within our businesses to reduce the risk of Modern Slavery and Human Trafficking within our Group and our supply chains, there is always more work to be done. We acknowledge that our efforts must be continual and as such we intend to undertake the following steps over the next 12 months:

- To continue to develop the action plan to reduce high risks within the GSS supply chain;
- Review and develop the training provided to new employees to ensure ongoing effectiveness;
- To roll out the briefing/training session to all Group companies to help employees spot the signs of human trafficking;
- Review the Stronger Together toolkits 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 implement effectively our Anti-Slavery policy and procedures; and
- Introduce key performance indicators to monitor the effectiveness of our steps.

A handwritten signature in black ink, appearing to read "Bill Douie", is written over a large, faint, light-colored oval shape.

Bill Douie  
Chairman  
19 June 2019