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Opening statement from Senior Management

Red Rhino Resourcing Ltd commits to developing and adopting a proactive approach to prevent, respond to, and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within its workplaces.

Modern slavery is a broad term used to encompass offences that involve one person depriving another person of their liberty, to exploit them for personal or commercial gain.

Forced labour is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily.

Debt-bonded labour is where a person's labour is demanded as a means of repayment for a loan or service.

Human trafficking is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for exploitation.

Hidden labour exploitation is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider.

Scope

This Policy applies to all staff and temporary workers, business partners, including suppliers, service providers, subcontractors and 2nd tier labour providers are also required to adhere to the standards set out in this Policy.

The requirements in this Policy constitute minimum and not maximum standards and should not be used to prevent the exceeding of these standards. Where the provisions of law and this Policy address the same issues, both we and our business partners must apply whichever provision affords the greater protection.

Responsibility

The Managing Director and Senior Leadership Team are responsible for supervising the implementation of and compliance with this policy. The Managing Director assumes operational responsibility for the implementation of and compliance with the declaration of the Policy. It is the responsibility of all employees and workers throughout the business to ensure this policy is adhered to within all its recruitment practices.



Policy Commitments

1. Designate appropriate managers from the team to attend “Tackling Hidden Labour Exploitation” training and to have responsibility for developing and operating company procedures relevant to this issue
2. Ensure that all staff responsible for directly recruiting workers are trained to be aware of issues around third-party labour exploitation and signs to look for and have signed the appropriate Recruiter Compliance Principles policy document.
3. In line with our commitment to identifying any potential signs of modern slavery, forced labour or human trafficking, and ultimately preventing labour exploitation from occurring within our operation, we have sourced, developed, and undertaken the following training programmes:
 - The initial training plan will be made up of in-branch training, e-learning modules, and attendance to classroom training for specific courses
 - Included within the E-Learning training sessions is an interactive module on spotting the signs of Modern Slavery which is to be completed by all new starters and refreshed annually;
 - Regular attendance to ALP and Stronger Together Roadshows and/or webinars;
 - External training is sourced and attended as required based on individual staff needs.
4. Accept that job-finding fees are a business cost and will not allow these to be paid by job applicants
5. Not use any individual or organisation to source and supply workers where they:
 - a. Have not been signed off by the central compliance team following successful completion of The Company Supplier Due Diligence Process
 - b. Do not hold a valid GLAA licence, save where a valid exemption of GLAA requirement is approved by the central compliance team
 - c. Have not confirmed that workers are not being charged a work-finding fee
6. Ensure that labour sourcing, recruitment and worker placement processes are under the control of trusted and competent staff members
7. Provide information on tackling “Hidden Labour Exploitation” to our workforce through the sending of Stronger Together leaflets as part of the onboarding process specifically contained within the ‘welcome email’ and displaying the Stronger Together posters in all of our offices and onsite operations.
8. Encourage workers to report cases of hidden third-party labour exploitation, provide the means to do so and investigate and act on reports appropriately.
9. Endeavor to collaborate with clients and create new partnerships to join together to tackle modern slavery, share intelligence where permitted and strengthen our network to identify, assist and support victims of modern slavery.



Our processes aim to

1. Identify, monitor and manage areas of potential risk in our business and supply chains
2. Scrutinise any identified areas of risk within our business and supply chains
3. Adopt a zero-tolerance approach to slavery and human trafficking throughout the organisation and our supply chains
4. Provide support and protection from detriment or disadvantage to any person who, in the public interest, raises genuine concerns amounting to a protected disclosure.

Risk and Compliance

1. Our organisation regularly evaluates the nature and extent to which our business and our supply chains are exposed to the risk of modern slavery occurring
2. We do consider that we operate in high-risk sectors because modern forms of slavery are prevalent in this country.
3. Where we have identified a potential risk, we prioritise any risks and take appropriate action to put remedial measures in place.
4. We ensure our suppliers are aware of our policies and encourage them to adopt our high standards. We adopt a zero-tolerance approach to slavery and human trafficking throughout the organisation which extends to our supply chains. Upon discovery of a breach of our policies relating to slavery and human trafficking, we will terminate any relationship with the relevant supplier with immediate effect.

As part of our efforts to monitor, manage and reduce the risk of slavery and human trafficking occurring within our business or supply chains, we adopt the following due diligence procedures:

- Independent auditors who monitor our supply chains on our behalf
- RTW document checks
- Workers holding their own individual bank accounts/ phone numbers/addresses
- Registrations hold in the office

The Company commits to the principle of continuous improvement. Any systems in place must be regularly evaluated and assessed on the basis of measurable effectiveness, in accordance with changing environments, and be adapted or expanded as required. The HR Director will review and update this policy at regular intervals.