



# **RSK GROUP LIMITED**

## **Anti-Slavery & Human Trafficking Policy**

**August 2021**



## 1. INTRODUCTION

- 1.1 This Anti-Slavery and Human Trafficking Policy (“**policy**”) has been developed to set out our position in respect of slavery and human trafficking (“**modern slavery**”) and to help employees and anyone acting for or on behalf of RSK Group Limited or any of its subsidiaries, wherever located, to understand what modern slavery is and what our responsibilities are in respect of the prevention, detection and reporting of modern slavery in our business and supply chains.
- 1.2 This policy does not form part of any employee's contract of employment and we may amend it at any time.
- 1.3 **Who must comply with this policy?**
- 1.4 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, wherever located.
- 1.5 **Who is responsible for this policy?**
- 1.6 The **RSK Group Limited board of directors** has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under its control comply with it.
- 1.7 The primary and day-to-day responsibility for implementing this policy sits with the **Managing Director** for each RSK Group company or business and the **Head of each Group Central Function** for each of our central support function departments. The Managing Directors and Head of each Group Central Department, with support from our **Legal & Compliance Counsel**, shall be responsible for monitoring the use and effectiveness of this policy, dealing with any queries about it, and auditing internal compliance control systems and procedures to ensure they are effective.
- 1.8 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it.
- 1.9 On an annual basis, each RSK Group Divisional Director, on behalf of the Managing Directors in his or her division, and the Head of each Group Central Function is required to report to our Legal & Compliance Counsel on compliance with this policy in his or her division or central support function department, together with a review of the relevant risk assessment(s), monitoring procedures and recommendations for changes. A summary report of the reports will be submitted to the RSK Group Limited Board for review.
- 1.10 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to our Legal & Compliance Counsel.
- 1.11 **Your responsibilities**
- 1.12 You must ensure that you read, understand and comply with this policy.



- 1.13 The prevention, detection and reporting of modern slavery are the responsibility of all those working for us or under our control.
- 1.14 You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 1.15 The Managing Director of each RSK Group company or business and Heads of Group Central Functions must ensure that this policy is communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and as appropriate thereafter and that compliance with this policy is incorporated into their engagement contract.
- 1.16 If you believe or suspect that a conflict with this policy has occurred or may occur in the future, you must report it as soon as possible.
- 1.17 **How to raise a concern**
- 1.18 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 1.19 If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your line manager, Managing Director, Divisional Director, our Legal & Compliance Counsel or through the Whistleblowing Policy as soon as possible.
- 1.20 If you believe or suspect that any breach of this policy has occurred or may occur (as explained in Section 2 of this policy), you must notify your line manager, Managing Director, Divisional Director or our Legal & Compliance Counsel or report it in accordance with our Whistleblowing Policy as soon as possible. You should note that where appropriate, and with the welfare and safety of local workers as a priority, we may give support and guidance to our suppliers to help them address coercive or exploitative work practices in their own business and supply chains.
- 1.21 There are certain activities highlighted in this policy that must be reported as soon as possible.
- 1.22 “Turning a blind eye” to suspicious activity is not acceptable.
- 1.23 **Protection**
- 1.24 Individuals who raise concerns or report another's wrongdoing, are sometimes worried about possible repercussions. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken.
- 1.25 We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains.
- 1.26 Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform our Legal & Compliance Counsel immediately. If the matter is not remedied, and you are an employee, you should raise it formally using the RSK Grievance Procedure.



**1.27 Training**

1.28 RSK's employee induction and online training programmes covers compliance with modern slavery laws. Regular update and refresher training will be provided as necessary.

**1.29 Breaches of this policy**

1.30 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

1.31 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.

**2. WHAT IS MODERN SLAVERY?**

2.1 "Modern slavery" covers various forms of slavery and human trafficking which include slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain:

2.1.1 'slavery' is where ownership is exercised over a person;

2.1.2 'servitude' involves the obligation to provide services imposed by coercion;

2.1.3 'forced or compulsory labour' involves work or service extracted from any person under the menace of a penalty and for which the person has not offered himself voluntarily; and

2.1.4 'human trafficking' concerns arranging or facilitating the travel of another with a view to exploiting them.

2.2 Any act of "modern slavery" is a crime and a violation of fundamental human rights.

**3. WHAT IS RSK'S POLICY IN RESPECT OF MODERN SLAVERY?**

3.1 We have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in our own business or in any of our supply chains.

3.2 Our commitment to the protection of human rights is embedded in our Corporate Responsibility and Sustainability Route Map, a copy of which is available on our website.

3.3 Our Anti-Slavery & Human Trafficking Statement, as published on our website, sets out the measures that we are taking to tackle the risk of modern slavery in our business and supply chains.

3.4 We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether



adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.

**This Policy has been approved and adopted by the RSK Group Limited Board.**

*Alan Ryder*  
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**Alan Ryder, Chief Executive**

**Date:** 6 August 2021  
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