



Policy number:	GOV06  July 2019		Category:  Next review date:		Governance July 2020
Created:					
Version number:	1 1 1	Revision number:	0	Revision date:	
Approved by:	M MATHEWS		Signed:	Mad	1

# Modern Slavery and Human Trafficking Policy

# 1. Policy statement

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, agents, contractors and suppliers.

# 2. Managing the Policy

The custodian of the Policy is the Directors of RedCortex who shall be responsible for the administration, revision and interpretation of the Policy.

#### 3. Commitments

### Modern Slavery and Human Trafficking

Modern slavery is a term used to encompass slavery, servitude, forced and compulsory labour, bonded and child labour and human trafficking. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited. Modern slavery is a crime and a violation of fundamental human rights.

#### Commitments

We shall be a company that expects everyone working with us or on our behalf to support and uphold the following measures to safeguard against modern slavery:

- We have a zero-tolerance approach to modern slavery in our organisation and our supply chains.
- The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain in the responsibility of all those working for us or on our behalf. Workers must not engage in, facilitate or fail to report any activity that might lead to, or suggest, a breach of this Policy.
- We are committed to engaging with our stakeholders and suppliers to address the risk of modern slavery in our operations and supply chain.
- We take a risk-based approach to our contracting processes and keep them under review. We assess whether the circumstances warrant the inclusion of specific prohibitions against the use of modern





slavery and trafficked labour in our contracts with third parties. Using our risk-based approach, we will also assess the merits of writing to suppliers requiring them to comply with our Policy.

- Consistent with our risk-based approach, we may require:
  - employment and recruitment agencies and other third parties supplying workers to our organisation to confirm their compliance with our Policy on Modern Slavery and Human Trafficking.
  - o suppliers engaging workers through a third party to obtain that third party's agreement to adhere to our Policy on Modern Slavery and Human Trafficking.
- As part of our ongoing risk assessment and due diligence processes, we will consider whether circumstances warrant us carrying out audits of suppliers for their compliance.
- If we find that other individuals or organisations working on our behalf have breached this Policy, we will ensure that we take appropriate action. This may range from considering the possibility of breaches being remediated and whether than might represent the best outcome for those individuals impacted by the breach, to terminating such relationships.

### 4. If in doubt / advice

Questions can be directed to the RedCortex Directors.