



# Anti-Slavery and Human Trafficking Policy

redcentric

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<b>Applies to:</b>	ALL UK AND INDIA EMPLOYEES
<b>Date of Approval:</b>	18 November 2024

## Document Control

<b>Title</b>	Anti-Slavery and Human Trafficking Policy
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<b>Reviewer</b>	Legal Counsel
<b>Business Area</b>	Legal
<b>Review Cycle</b>	Annual

## Document History

Version	Date	Changes	Change Control Reference	Document Status
1	August 2022	New document	n/a	Live

## Document Ownership

Redcentric's General Council and Company Secretary is the owner of this document and is therefore responsible for ensuring that this procedure is reviewed in line with the review requirements of Redcentric's ISO9001 Quality Management System

## 1. Introduction

References to “our”, “we”, “us”, “Redcentric” in this Anti-Slavery and Human Trafficking Policy (“Policy”) are references to Redcentric plc, its subsidiaries and affiliates.

### Our approach

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

Modern slavery is a crime and a gross violation of fundamental human rights. It takes various forms, such as 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. Who does the Policy apply to?

- 2.1. The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all those working for us or under our control. This Policy applies to everyone who works 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.
- 2.2. This Policy does not form part of any employee's contract of employment and we may amend it at any time.

## 3. What is modern slavery?

- 3.1. Modern slavery is a crime resulting in an abuse of human rights. It is constituted in the Modern Slavery Act 2015 by the offences of ‘slavery, servitude and forced or compulsory labour’ and ‘human trafficking’. Below are more detailed definitions of the different elements of modern slavery:
  - **Slavery** is the status or condition of a person over whom all or any of the powers attaching to the right of ownership are exercised. Since legal ‘ownership’ of a person is not possible, the key element of slavery is the behaviour on the part of the offender as if he/she did own the person, which deprives the victim of their freedom;
  - **Servitude** is the obligation to provide services that is imposed by the use of coercion and includes the obligation for a ‘serf’ to live on another person’s property and the impossibility of changing his or her condition;
  - **Forced or compulsory labour** is defined in international law by the ILO’s Forced Labour Convention 29 and Protocol. It involves coercion, either direct threats of violence or more subtle forms of compulsion. The key elements are that work or service is exacted from any person under the menace of any penalty and for which the person has not offered him/her self voluntarily;
  - **Human trafficking** requires that a person arranges or facilitates the travel of another person with a view to that person being exploited. The offence can be committed even where the victim consents to the travel.
- 3.2. The Modern Slavery Act also places an obligation on Redcentric to police its supply chain, to ensure (so far as is reasonably possible) that no suppliers to Redcentric are themselves guilty of modern slavery offences.
- 3.3. Annually Redcentric must publish on its website a modern slavery statement, affirming that it continues to take measures to minimise the risk of modern slavery in its business and supply chain.

#### **4. Who is responsible for this Policy?**

- 4.1. The board of directors has overall responsibility for ensuring this Policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 4.2. 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 and the issue of modern slavery in supply chains.

#### **5. What you must do**

- 5.1. You must ensure that you read, understand and comply with this Policy. You are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 5.2. Our zero-tolerance approach to modern slavery and human trafficking must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.
- 5.3. You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or in the supply chains of any supplier tier at the earliest possible stage.
- 5.4. You must notify your manager as soon as possible if you believe or suspect that a conflict with this Policy has occurred, or may occur in the future. If you believe or suspect that a breach of this Policy has occurred or may occur in future you must notify your manager or report it in accordance with our whistleblowing policy as soon as possible.
- 5.5. 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 you should raise it with your manager.
- 5.6. 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. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicions that modern slavery of whatever form is or may be taking place in any part of our business or in any of our supply chains. If you believe that you have suffered any such treatment, you should inform the compliance manager immediately.

#### **6. Failure to comply with this Policy**

If you breach this Policy it will normally be treated as gross misconduct and action will be taken against you within our disciplinary procedure, which may include summary dismissal.

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