

## MODERN SLAVERY POLICY

### Introduction and Policy Statement

The Modern Slavery Act 2015 (the 'Act') mandates that Red Twin Limited (the Company) prepares a slavery and human trafficking statement each financial year.

Modern slavery and human trafficking in all their various forms and guises are a crime in the UK and much of the world and a violation of fundamental human rights.

The Company have a zero-tolerance approach to modern slavery and human trafficking and are committed to acting ethically and with integrity in all activities and business relationships and we expect our supply chain, contractors, employees and all other business partners to commit to the same, including implementing and enforcing effective systems and controls to prevent and detect modern slavery.

### Modern Slavery risk in the context of Red Twin Limited's business

- In all jurisdictions in which Red Twin operates, its activities are concerned with the provision of consultancy services and ancillary or related services. Red Twin typically provides those services via sub-contract agreements with other companies.
- Red Twin rarely employs agency workers or contractors. If agency or sub-contract workers are utilised, they would be treated equally as our full time and permanent employees.
- All employees, contractors and agency workers are required to adhere to the Policy (defined below). We aim to provide our employees with guidance and actively encourage them on how to report slavery concerns using our Code of Conduct and Whistleblowing Policy.

### Responsibility For The Policy

The Directors and senior management team of the Company have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all persons working for us or on our behalf in any capacity comply with it.

The prevention, detection and reporting of modern slavery in any part of our business or supply chain is the responsibility of all persons working for us or on our behalf in any capacity (including our employees, suppliers, workers, directors, agents, distributors and all third party business partners).

Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate training on it and the issue of modern slavery in supply chains.

### Commitment

The Company are implementing and enforcing a number of measures, policies and controls both internally and externally to ensure compliance with the requirements of the Modern Slavery Act 2015 including:

- Training on this policy and the risk our business faces from Modern Slavery and Human Trafficking forms part of the induction process for all individuals joining the business and an e-learning module has been created for all existing staff employed in a purchasing function. Regular refresher training will be provided as required.

- The issues surrounding Modern Slavery and Human Trafficking have been added to the Company Handbook which is available to all employees.
- The Company Supplier's Charter and Terms and Conditions of Purchase have been amended to encompass Modern Slavery and Human Trafficking and copies are available for our suppliers on request.
- All of our major suppliers have been contacted and have received a copy of our Modern Slavery and Human Trafficking policy along with our updated Supplier Charter.

## Compliance

All people working for us or on our behalf in any capacity must:

- Read, understand and comply with this policy, and avoid any activity that might lead to, or suggest, a breach of this policy;
- Notify their immediate manager as soon as possible if they believe or suspect that a conflict with this policy has occurred, or may occur in the future; and
- 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.

## Breaches of Policy

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

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

## Ongoing Review

The Company will review both its supply chains and external operations and its internal operations on an ongoing basis to check compliance with the above policy, and to check that our policy is being implemented effectively.



Signed: Ian Matthews, Director

Date: November 2019  
Next Review January 2020

END OF POLICY