

Modern Slavery Policy

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Introduction

This statement is made pursuant to s.54 of the Modern Slavery Act 2015 and sets out the steps that Red Snapper Group (RSG) has taken and is continuing to take, to ensure that modern slavery or human trafficking is not taking place within our group, businesses or supply chain. The Red Snapper Group incorporates the following businesses:

- Red Snapper Recruitment Limited
- Red Snapper Managed Services Limited
- Red Snapper Learning Limited
- Red Snapper Media Limited.

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. RSG has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

Our Business

The Group acts as an employment business, staffing services business, managed service and project outsource provider, recruitment process outsource business, education and training business, online media business and news and information business.

RSG is a company which provides a range of services to clients. Red Snapper Recruitment specifically, is a provider of high-volume temporary labour across our public sector clients. As part of our services as an owner-managed group of businesses, RSG provides both temporary labour and managed services, across diverse government sectors.

We operate within the government sector, which includes central and local authorities, police, ministry of defence, ministry of justice, criminal justice and non-government organisations.

RSG must remain vigilant to the possibility of slavery and human trafficking forming part of our business and/or supply chains. We appreciate that the recruitment industry faces particular challenges in this area, although consider that our key areas of specialism make this less likely.

Our High-Risk Areas

We are committed to ensuring there is no modern slavery or human trafficking in any part of our business. Our Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere within the group.

As part of our initiative to identify and mitigate risk, we undertake due diligence when considering taking on new suppliers and perform regular reviews on our existing suppliers. The Group's due diligence process includes building long-standing relationships, evaluate modern slavery and human trafficking risks for each supplier and implement systems to report concerns and the protection for whistle blowers.

We are confident in mitigating risk and reporting of suspicious activities. As an exclusive partner to the Home Office and the UK Human Trafficking Centre (UKHTC), operated by the National Crime Agency (NCA), our reporting processes are robust which complies with the standards set within the law enforcement guidelines.

We have zero tolerance to slavery and human trafficking within the group and that of our suppliers.

Our Policies

We confirm to and operate a number of internal and client policies, to ensure that we are conducting business in an ethical and transparent manner. These include.

1. Modern Slavery policy. This policy sets out the organisation's stance on modern slavery and explains how employees can identify any instances of this and where they can go for help.
2. Recruitment policy. We operate a robust recruitment policy, including conducting eligibility to work in the UK checks for all employees to safeguard against human trafficking or individuals being forced to work against their will.
3. Whistleblowing policy. We operate a whistleblowing policy so that all employees know that they can raise concerns about how colleagues are being treated, or practices within our business.
4. Code of Conduct. This code explains the manner in which we behave as an organisation and how we expect our employees and suppliers to act.

Our Suppliers

RSG operates a supplier policy and maintains a preferred supplier list. We conduct due diligence on all suppliers before allowing them to become a preferred supplier. This due diligence includes an online search to ensure that our suppliers have never been convicted of offenses relating to modern slavery. We also visit our suppliers on their site for quality management and contract reviews. In addition, we also observe their working practices and conditions to fulfil us with confidence they meet the legislation.

Our Modern Slavery Policy forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this policy.

In addition to the above, as part of our contract with suppliers, we require each supplier to confirm to us that:

1. They are committed to ensuring their operations and supply chains are free from modern slavery and have taken appropriate steps to comply with the Modern Slavery Act 2015
2. They hold their own suppliers to account over modern slavery
3. For UK suppliers, they pay their employees at least the national minimum wage / national living wage (as appropriate)
4. For international suppliers, they pay their employees any prevailing minimum wage applicable within their country of operations
5. We may terminate the contract at any time should any instances of modern slavery become known.

Training

To promote a strong understanding of the risks of modern slavery and human trafficking within our business and supply chains, we provide targeted training to staff and have implemented a system of checks to support informed decision-making and responsible procurement practices.

Our Performance Indicators

We will know the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain if:

- No reports are received from employees, the public, or law enforcement agencies to indicate that modern slavery practices have been identified.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the relevant financial year.

Review

This policy will be reviewed annually by the document owner. Revisions, however, may be made throughout the year due to a change in legislation.

Formal Sign Off

This policy has been formally reviewed and signed off by top management:

A handwritten signature in black ink, appearing to read 'M. Jerrold'.

Martin Jerrold
Managing Director
Red Snapper Group

End.