

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

**Human Resources**

**Date March 2017**

## TITLE

### ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Questions or concerns relating to this Policy should be addressed to the Company's Compliance Officer. The current Compliance Officer is Steve Brain, HR Director, who can be contacted at [steve.brain@radius-systems.com](mailto:steve.brain@radius-systems.com) or on 01773 582275.

## ABOUT THIS POLICY

### 1. About this Policy

- 1.1 This Policy applies to Radius Systems Limited and any company which at the relevant time is a subsidiary or holding company of Radius Systems Limited (the Group). Any reference to "the Company" in this Policy refers to Radius Systems Limited and every member of the Group.
- 1.2 The purpose of this Policy is to set out the values, principles and responsibilities the Company adheres to with regard to modern slavery and which the Company expects from all associated persons including the Company's Suppliers, Agents, Joint Venture Partners, Representatives, Intermediaries, Consultants, Contractors, Employees, Advisors and other intermediaries representing the Company (APs).
- 1.3 All APs are required to comply with this Policy. Local laws, custom and practice do not justify any departure from this Policy.
- 1.4 This Policy does not form part of any employee's contract of employment and the Company may amend this Policy at any time. However, any breach of this Policy is a disciplinary offence under any employee of the Company's terms of employment.

### 2. Introduction to Modern Slavery

- 2.1 Modern slavery is a crime and a violation of fundamental human rights. It takes various forms, 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. The Modern Slavery Act 2015 (**MSA**) covers four activities, all of which are covered by this Policy:

<b>Slavery</b>	Exercising powers of ownership over a person
<b>Servitude</b>	The obligation to provide services is imposed by the use of coercion
<b>Forced or compulsory labour</b>	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily
<b>Human trafficking</b>	Arranging or facilitating the travel of another person with a view to their exploitation



2.2 There are a variety of ways in which these four activities can occur in a business' operations such as:

<b>By association</b>	An example of modern slavery by association is where trafficking occurs within the local area as the result of a business' operations
<b>Directly</b>	An example of direct modern slavery is where a business employs a trafficked or exploited person
<b>Indirectly</b>	An example of indirect modern slavery is where illegal subcontracting occurs within the supply chain or through use of products which have been produced by people under conditions of forced labour

2.3 The MSA recognises the important role businesses can play in tackling modern slavery and with this in mind, the Company has identified that the principal areas of risk the Company faces related to modern slavery include:

- 2.3.1 the Company's supply chain;
- 2.3.2 any outsourced activities, particularly to jurisdictions that may not have adequate safeguards;
- 2.3.3 recruitment through agencies; and

The Company manages these risks through its procedures set out in this Policy and elsewhere.

#### **Prohibition of Modern Slavery**

3. The Company does not tolerate modern slavery and the Company is committed to acting ethically and with integrity in all of the Company's business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in the Company's business or in any of the Company's supply chains.

3.1 The Company is also committed to ensuring there is transparency in the Company's business and in the Company's approach to tackling modern slavery throughout the Company's supply chains, consistent with the Company's disclosure obligations under the MSA. The Company expects the same high standards from all APs and as part of the Company's contracting processes, the Company includes specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and the Company expects that all APs will hold their own suppliers to the same high standards.



- 3.2 The Company will:
- 3.2.1 maintain clear policies and procedures preventing exploitation and human trafficking, and protecting the Company's workforce and reputation;
  - 3.2.2 be clear about the Company's recruitment policy;
  - 3.2.3 check the Company's Supply Chains;
  - 3.2.4 lead by example by making appropriate checks on all employees, recruitment agencies, suppliers etc. to ensure the Company knows who is working for the Company;
  - 3.2.5 ensure the Company has in place an open and transparent grievance process for all staff;
  - 3.2.6 seek to raise awareness so that the Company's colleagues know what the Company is doing to promote their welfare; and
  - 3.2.7 make a clear annual statement that the Company's takes its responsibilities to its employees and its clients seriously.
- 3.3 Managers will:
- 3.3.1 listen and be approachable to colleagues;
  - 3.3.2 respond appropriately if they are told something that might indicate a colleague is in an exploitative situation;
  - 3.3.3 remain alert to indicators of slavery;
  - 3.3.4 raise the awareness of the Company's Employees by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do; and
  - 3.3.5 use their experience and professional judgement to gauge situations.
- 3.4 The Company and APs all have responsibilities under this Policy. Whatever role or level of seniority, Employees must:
- 3.4.1 keep their eyes and ears open - if an Employee suspects someone (a colleague or someone in the Company Supply Chain) is being controlled or forced by someone else to work or provide services, follow the Company's reporting procedure;
  - 3.4.2 follow the Company's reporting procedure if a colleague tells them something they think might indicate they are or someone else is being exploited or ill-treated; and
  - 3.4.3 tell the Company if they think there is more the Company can do to prevent people from being exploited.
- 3.5 This Policy applies to all of the Company's Business Units and extends to all of the Company's majority owned business dealings and transactions in all countries in which it or its subsidiaries and associates operate. Where there is a minority interest the Company will encourage the application of this Policy. This Policy applies in all countries in the world regardless of local practice and custom.



#### 4. **Treatment of People**

- 4.1 APs must not use any form of forced, bonded or involuntary labour, and workers must not be obliged to lodge identity papers or pay any deposit as a condition of work.
- 4.2 Workers in AP's Supply Chain must not be subject to physical or verbal abuse or threats or intimidation of any description.
- 4.3 Workers must not be required to work extreme hours or work without adequate rest periods.
- 4.4 APs must not use workers under the age of 15, or the minimum legal working age in the country in question, if higher than 15. APs must accept the principles of remediation of child and under age workers, and where such labour is discovered APs must establish and implement appropriate remediation for such workers and introduce effective systems to prevent the use of child labour in the future.
- 4.5 Factories and work sites used by APs must be safe and hygienic with an adequate number of safe and accessible fire exits from all buildings including living accommodation and workers must have access to drinking water.
- 4.6 Workers' life or limb must not be endangered due to the use of dangerous machinery, unsafe building structure or layout, or hazardous chemicals. Where serious or fatal accidents have occurred APs must demonstrate to the Company's satisfaction that all appropriate steps have been taken to prevent similar accidents occurring in the future.
- 4.7 Accommodation, where provided, must be in buildings that are separate from other areas of the workplace and have an adequate fire alarm system.
- 4.8 APs must pay wages which are fair i.e. sufficient to meet basic needs and to provide some additional income.
- 4.9 APs must maintain proper and accurate employment records including calculation of pay and hours worked and APs must be transparent and cooperative with regard to the inspection of employment records.

#### 5. **Procedures**

##### 5.1 **Anti-slavery statement**

- 5.1.1 The Company makes a clear annual statement that the Company takes its responsibilities to its employees, people working within its supply chain and its clients seriously.
- 5.1.2 The Company makes this statement on the Company's website and as part of the Company's reporting obligations.

##### 5.2 **Supply chains**

- 5.2.1 The Company thoroughly checks supply chains to ensure the potential for slavery and human trafficking is significantly reduced.
- 5.2.2 The Company will tell any suppliers it does business with that the Company is not prepared to accept any form of exploitation.



5.2.3 All of the Company's supplier contracts will contain an anti-slavery clause. This clause, which flows down through all layers of the Company's supply chain, prohibits suppliers and their employees from engaging in slavery or human trafficking.

5.2.4 The Company monitors each step of its supply processes to ascertain that Suppliers meet the Company's requirements regarding anti-slavery and human trafficking including but not limited to:

(a) *SUPPLY CHAIN MAPPING*

The Company will map its supply chain, starting with first-tier suppliers, to identify risk areas. The Company recognises that there is no one-size-fits-all approach to managing supply chain risks and any steps taken by the Company will be customised to respond to the results of the risk assessment and profile.

(b) *SEEK ASSURANCES*

Under the Company's standard form anti-slavery clause, each supplier must undertake a risk assessment of its business and develop effective and proportionate modern slavery prevention procedures.

The Company may require Suppliers to provide the Company with references, statements, findings, risk assessments, policies and procedures in respect of modern slavery, together with details of their suppliers, countries of production and raw materials used.

(c) *DESKTOP SEARCHES*

Periodically, the Company will carry out desktop and internet searches to satisfy itself that there are no reported incidents of modern slavery or factors indicating an increased risk of modern slavery within a Supplier's business.

(d) *AUDITS AND SITE VISITS*

The Company's standard form anti-slavery clause gives the Company the right to interview and audit APs. The Company will periodically conduct AP audits, including site visits to review working practices and conditions at AP's premises, to ensure expected standards are being met.

When establishing key contracts with APs, the Company may visit the delivery sites located in the country of origin where the labour is based to satisfy itself that the AP and specific sites comply with the Company's approach to modern slavery.

### 5.3 **Acquisitions**

Each time the Company acquires any business, the due diligence associated with the proposed acquisition must include investigation of the acquisition target's compliance with the MSA and any related laws and regulations.

### 5.4 **Joint Ventures**

5.4.1 Whenever the Company decides to undertake business with a Joint Venture Partner, the Company will conduct a review of the prospective Joint Venture Partner or Partners compliance with the MSA and any related laws and regulations.



5.4.2 Where appropriate and necessary the Company will seek additional local legal advice in respect of any joint ventures overseas.

## 5.5 Recruitment

5.5.1 The Company's HR Department follows firm policy and only uses agreed specified reputable recruitment agencies.

5.5.2 To ensure the potential for slavery and human trafficking is reduced as far as possible, the Company thoroughly check recruitment agencies before adding them to its list of approved agencies. This includes:

- (a) conducting background checks.
- (b) investigating reputation.
- (c) ensuring the staff it provides have the appropriate paperwork (eg work visas).
- (d) ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying.

5.5.3 The Company keeps agents on the list under regular review, at least every 3 years.

5.5.4 The Company always ensures that all Employees have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

5.5.5 The Company always ensure that Employees are legally able to work in the UK.

5.5.6 The Company checks the names and addresses of its Employees (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).

5.5.7 The Company provides information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.

5.5.8 If, through the Company's recruitment process, the Company suspects someone is being exploited, the HR Department will follow the Company's reporting procedures.

## 5.6 Contract Procedures

5.6.1 Persons or entities who provide goods or services to the Company or on the Company's behalf must meet the Company's standards and abide by the Company's Policy with regard to modern slavery. If those persons do not meet with these standards then their contracts will be terminated and the Company will actively seek to recover any losses the Company may suffer as a result.

5.6.2 The Company has developed standard form clauses for inclusion in its trading contracts dealing with modern slavery which, in essence, enable it to terminate contracts if modern slavery is established. APs must use these clauses at least as a starting point in all applicable transactions.

5.6.3 Unless otherwise approved in writing by the Board of Directors, all contracts with Agents, Distributors, Consultants, and other third parties, all joint venture, partnership and shareholder contracts and all contracts for the acquisition of entities or business assets, must include the Company's standard modern slavery clauses.



## 6. **Responsibility for the Policy**

- 6.1 The Board of Directors has overall responsibility for ensuring this Policy complies with the Company's legal and ethical obligations, and that all those under the Company's control comply with it.
- 6.2 The Compliance Officer has primary and day-to-day responsibility for implementing this Policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in countering modern slavery.
- 6.3 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.
- 6.4 Employees are invited to comment on this Policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Compliance Officer.

## 7. **Identifying Slavery**

- 7.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.
- 7.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim:
  - 7.2.1 The person is not in possession of their own passport, identification or travel documents.
  - 7.2.2 The person is acting as though they are being instructed or coached by someone else.
  - 7.2.3 They allow others to speak for them when spoken to directly.
  - 7.2.4 They are dropped off and collected from work.
  - 7.2.5 The person is withdrawn or they appear frightened.
  - 7.2.6 The person does not seem to be able to contact friends or family freely.
  - 7.2.7 The person has limited social interaction or contact with people outside their immediate environment.
- 7.3 This list is not exhaustive.
- 7.4 A person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking.
- 7.5 If any AP has a suspicion, report it.



## 8. **Compliance with the Policy**

- 8.1 APs must ensure that they read, understand and comply with this Policy.
- 8.2 The Company operates a policy of individual accountability. Each AP is accountable for compliance with this Policy.
- 8.3 The prevention, detection and reporting of modern slavery in any part of the Company's business or supply chains is the responsibility of all those working for the Company or under the Company's control. APs are required to avoid any activity that might lead to, or suggest, a breach of this Policy.
- 8.4 APs must notify their Manager or the Compliance Officer as soon as possible if they believe or suspect that a conflict with this Policy has occurred, or may occur in the future.
- 8.5 APs are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of the Company's business or supply chains of any supplier tier at the earliest possible stage.
- 8.6 If an AP believes or suspects a breach of this Policy has occurred or that it may occur, they must notify their Manager or the Compliance Officer or report it in accordance with the Company's Whistleblowing Policy as soon as possible.
- 8.7 If an AP is unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of the Company's supply chains constitutes any of the various forms of modern slavery, then they must raise it with their Manager or the Compliance Officer.
- 8.8 The Company encourages openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. The Company is 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 the Company's business or supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If an AP believes that they have suffered any such treatment, they should inform the Compliance Officer immediately. If the matter is not remedied, and the AP is an employee, they should raise it formally using the Company's Grievance Procedure.

## 9. **Communication and Awareness of the Policy**

- 9.1 Training on this Policy, and on the risk the Company faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for the Company, and regular training will be provided as necessary.
- 9.2 This Policy must be communicated to all APs at the outset of the Company's relationship with them and reinforced as appropriate thereafter.



10. **Breaches of the Policy**

- 10.1 Any Employee who breaches this Policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 10.2 The Company may terminate its relationship with an AP if they breach this Policy.



Signed.....

Name .....Steve Brain .....

Position .....HR Director.....

Date .....20<sup>th</sup> March 2017 .....

