

**ANTI-SLAVERY HUMAN TRAFFICKING**

**1. What Is Slavery?**

1.1 The Modern Slavery Act (MSA) 2015 covers four activities:

Slavery	Exercising powers of ownership over a person
Human Trafficking	The recruitment, transportation, transfer, harboring or receipt of persons by means of the threat, use of force, coercion, abduction, fraud, deception, abuse of power or exploitation. In other words, it is the process of controlling a person with the intent to exploit them.
Servitude	The obligation to provide services is imposed by the use of coercion
Forced or compulsory labour	Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily

1.2 This policy covers all four activities.

**2. How Is It Relevant To Us?**

- 2.1 Modern slavery is a complex and multi-faceted crime and tackling it requires all of us to play a part.
- 2.2 At a very basic level, of course preventing exploitation and human trafficking, and protecting our workforce and reputation makes good business sense.
- 2.3 The MSA 2015 recognizes the important part businesses can and should play in tackling slavery and encourages them to do more.
- 2.4 With this in mind, we need to pay particularly close attention to:
  - 2.4.1 our supply chain
  - 2.4.2 any outsourced activities, particularly to jurisdictions that may not have adequate safeguards
  - 2.4.3 cleaning and catering suppliers
  - 2.4.4 corporate hospitality

**3. Responsibilities**

- 3.1 It’s our responsibility to ensure our fellow workers are safeguarded, treated fairly and with dignity.
- 3.2 Everyone must observe this policy and be aware that turning a blind eye is unacceptable and not an option.

3.3 Company's Responsibilities

3.3.1 We will:

- 3.3.1.1 maintain clear policies and procedures preventing exploitation and human trafficking, and protecting our workforce and reputation
- 3.3.1.2 be clear about our recruitment policy (see Recruitment)
- 3.3.1.3 check our supply chains
- 3.3.1.4 make sure our suppliers adhere to the policy
- 3.3.1.5 lead by example by making appropriate checks on all employees, recruitment agencies, suppliers, etc to ensure we know who is working for us
- 3.3.1.6 ensure we have in place an open and transparent grievance process for all staff
- 3.3.1.7 seek to raise awareness so that our colleagues know what we are doing to promote their welfare
- 3.3.1.8 make a clear statement that we take our responsibilities to our employees and our clients seriously (see Anti-slavery & Human Trafficking statement)

3.4 Managers

3.4.1 Managers will:

- 3.4.1.1 listen and be approachable to colleagues
- 3.4.1.2 respond appropriately if they are told something that might indicate a colleague is in an exploitative situation
- 3.4.1.3 remain alert to indicators of slavery
- 3.4.1.4 raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do
- 3.4.1.5 use their experience and professional judgement to gauge situations

3.5 Colleagues

3.5.1 We all have responsibilities under this policy. Whatever your role or level of seniority, you must:

- 3.5.1.1 keep your eyes and ears open—if you suspect someone (a colleague or someone in our supply chain) is being controlled or forced by someone else to work or provide services, follow our reporting procedure
- 3.5.1.2 follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated

3.5.1.3 tell us if you think there is more we can do to prevent people from being exploited

3.6 Collective Responsibilities

3.6.1 Additional actions incumbent on all RA employees, and anyone acting for or on behalf of RA, include:

3.6.1.1 Complying with International host country laws regarding transit, exit/entry visa procedures and requirements.

3.6.1.2 Not to engage in any scheme, plan or pattern intended to cause a person to believe that failure to perform an act would result in serious harm or physical restraint against any person.

3.6.1.3 To not knowingly provide or obtain labor by threats of serious harm, or by means of abuse or threatened abuse of law, or legal processes.

3.6.1.4 Refrain from using forced labor or commercial sex acts.

3.6.1.5 Report all forms of human trafficking.

**4. The Risks**

4.1 The principal areas of risk we face, related to slavery and human trafficking, include:

4.1.1 supply chains

4.1.2 recruitment through agencies

4.2 We manage these risk areas through our procedures set out in this policy.

**5. Our Procedures**

5.1 Anti-slavery statement

5.1.1 We make a clear annual statement that we take our responsibilities to our employees, people working within our supply chain and our clients seriously.

5.1.2 Our statement:

5.1.2.1 RA is committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain and imposes the same high standards on its suppliers. As stated within RA's 'Child Forced Labor & Human Trafficking' policy, RA has a zero tolerance for the use of child labor, forced labor or human trafficking practices. RA will not knowingly do any business with any sub-contractors, business partner, supplier or third parties who violate this policy.

5.1.2.2 Any concerns relating to child labor, forced labor or human trafficking practices must be reported immediately to your line manager and, the Compliance Manager or the CEO.

5.1.2.3 This policy sets out the key risk areas we face and our approach to avoiding and preventing modern slavery.

5.2 Supply chains

5.2.1 We thoroughly check supply chains to ensure the potential for slavery and human trafficking is significantly reduced.

5.2.2 We tell the companies we do business with that we are not prepared to accept any form of exploitation.

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

5.2.4 We ensure we can account for each step of our supply processes.

5.3 Recruitment

5.3.1 Using Agencies

5.3.1.1 Our Talent Acquisition Manager / HR department follow firm policy and only use agreed specified reputable recruitment agencies.

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

5.3.1.2.1 conducting background checks

5.3.1.2.2 investigating reputation

5.3.1.2.3 ensuring the staff it provides have the appropriate paperwork (e.g., work visas)

5.3.1.2.4 ensuring the agency provides assurances that the appropriate checks have been made on the person they are supplying

5.3.1.3 We keep agents on the list under regular review, at least every 2 years.

5.3.2 General Recruitment

5.3.2.1 We always ensure all staff have a written contract of employment and that they have not had to pay any direct or indirect fees to obtain work.

5.3.2.2 We always ensure staff are legally able to work in the country where they will discharge their duties.

5.3.2.3 We check the names and addresses of our staff (a number of people listing the same address may indicate high shared occupancy, often a factor for those being exploited).

5.3.2.4 We provide information to all new recruits on their rights including sick pay, holiday pay and any other benefits they may be entitled to.

## **6. Identifying Slavery**

6.1 There is no typical victim and some victims do not understand they have been exploited and that they are entitled to help and support.

However, the following key signs could indicate that someone may be a slavery or trafficking victim:

- 6.1.1 The person is not in possession of their own passport, identification or travel documents.
- 6.1.2 The person is acting as though they are being instructed or coached by someone else.
- 6.1.3 They allow others to speak for them when spoken to directly.
- 6.1.4 They are dropped off and collected from work.
- 6.1.5 The person is withdrawn or they appear frightened.
- 6.1.6 The person does not seem to be able to contact friends or family freely.
- 6.1.7 The person has limited social interaction or contact with people outside their immediate environment.

6.2 This list is not exhaustive.

6.3 Remember, 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. Often you will build up a picture of the person's circumstances which may indicate something is not quite right. If you have a suspicion, report it.

## **7. Human Trafficking**

Human Trafficking is a modern-day form of slavery. The United Nations defines human trafficking as the recruitment, transportation, transfer, harboring or receipt of persons by means of the threat, use of force, coercion, abduction, fraud, deception, abuse of power or exploitation.

In other words, it is the process of controlling a person with the intent to exploit them. Whilst the term 'trafficking' might imply some kind of movement, victims of human trafficking can be born into slavery or otherwise enslaved without having been transported anywhere.

There are various forms of human trafficking that we need to be aware of, including:

- 7.1 Forced labor
- 7.2 Sex trafficking
- 7.3 Bonded labor
- 7.4 Debt bondage
- 7.5 Involuntary domestic servitude
- 7.6 Forced child labor

7.7 Child sex trafficking

**RA has a zero-tolerance approach to Trafficking in Persons.**

**8. Reporting Slavery or Human Trafficking**

- 8.1 Talking to someone about your concerns may stop someone else from being exploited or abused.
- 8.2 If you think that someone is in immediate danger, you should discuss your concerns with your Line Manager, Compliance Manager or the CEO who will decide a course of action and provide any further advice.
- 8.3 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with your Line Manager, Compliance Manager or the CEO before taking any further action.


If you believe you have witnessed a trafficking operation or believe that a person is being trafficked, you should report it immediately to your line manager, the Compliance Manager or directly with the CEO. Alternatively, you can submit a report on the RA whistleblowing web page (EthicsPoint) via [raints.ethicspoint.com](https://raints.ethicspoint.com)

**9. Training**

We provide specialist training to those staff members who are involved in managing recruitment and our supply chains.

**10. Monitoring Our Procedures**

We will review our Anti-slavery policy regularly annually. We will provide information and/or training on any changes we make.

  
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Soraya Narfeldt  
CEO

Policy Implementation/ Review Date	Next Policy Review Date
January-2025	January-2026