

MODERN SLAVERY POLICY STATEMENT

Modern slavery is an unquestionable and indefensible violation of an individual’s basic human rights and is protected by The Modern Slavery Act 2015. R&W recognises it has a moral and social responsibility to take a zero-tolerance approach to modern slavery in all its forms.

We are committed to preventing slavery and human trafficking in all our Business Activities, ensuring, as far as we are able, that we and our supply chains are free from slavery and human trafficking.

To enforce this commitment R&W operate the following policies;

**Whistleblowing Policy (R&W-G-PL-15)** - Encouraging all our employees, to report any concerns relating to unlawful conduct, malpractice, dangers to the public or the environment, and any other matter of a serious nature.

**Quality Policy (R&W-G-PL-04)** - Ensuring that our suppliers adhere to the highest standards. Suppliers are required to declare that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. Serious violations of the Company’s Quality Policy will lead to the termination of the business relationship.

**Corporate Social Responsibility Policy (R&W-G-PL-13)** - our policy sets out the core values which we expect to be observed throughout the Company. The policy specifically mentions the Act and is published in the Company handbook.

To further enforce this commitment R&W produce the following guidance’s to its employees;

**Employee Handbook (formed of company policies, processes, procedures, code of practices – Business Management System)** – Ensuring employees actions and behaviour expected of them is made clear when representing the Company. R&W strives to maintain the highest standards of employee conduct and ethical behaviour when managing its supply chain.

**Supply Chain Procurement Procedure** - The Company is committed to ensuring that its suppliers adhere to the highest ethical standards. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect and act ethically and within the law in their use of labour (including agency workers). R&W works with suppliers to ensure that they meet the standards of the code and improve their workers working conditions. However, if serious violations of the this procedure is found it will lead to the termination of the business relationship.

Employees are often the first to realise that there may be something seriously wrong in relation to Modern Slavery being discovered. However, they may not express their concerns because they feel that speaking up would be disloyal to their colleagues, company or other stakeholders. They may also fear harassment or victimisation. In these circumstances, R&W encourages it’s employees to confidentially report any suspected cases of Modern Slavery to the dedicated Modern Slavery Helpline;

08000 121 700



Signed:

**Mr A Theobald**  
**Managing Director**

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**1.0 - Responsibility**

Whilst it is acknowledged that the responsibility in respecting Human Rights and environmental issues in the supplier chain is the suppliers' responsibility, R&W are committed to expressing our values and expectations throughout our supply chain.

It is the responsibility of the Quality Management team in liaison with the HR department to ensure that policies are implemented and reviewed and the processes outlined are sound and fit for purpose to ensure compliance with the company's objective to eliminate human trafficking and slavery.

It is the responsibility of the buying team and all Contracts Manager, Site Agents and other management above to risk assess the suppliers that the company uses to undertake work and supply resources. This will be assessed when each new supplier is required to undertake our Supplier initial HSE questionnaire and assessment prior to their use.

The Company will ensure they adopt and implement acceptable safety, environmental, product quality, product stewardship, labour, and human rights, social and legal standards in line with the supply chain of any products supplied to us.

It is the responsibility of the Quality Management Team in liaison with HR team to undertake investigations and due diligence in relation to suspected instances of slavery and human trafficking.

**2.0 – Thoroughness**

R&W places thoroughness at its core business values when considering taking on new suppliers and regularly reviews its existing suppliers. The Company's thoroughness and reviews include:

- Taking steps to improve substandard supplier's practices including providing advice to suppliers and requiring them to implement action plans.
- Invoking sanctions against suppliers who violate our policy
- Evaluating the modern slavery and human trafficking risks of each new supplier
- Conducting supplier audits or assessments which have more focus on slavery and human trafficking where general risks are identified

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