

## Introduction

This statement sets out RSR's actions to understand potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there are no activities which are associated with slavery or human trafficking within its own business and its supply chains. This statement relates to actions and activities during the financial year ending 31<sup>st</sup> December 2018.

As part of the UK construction industry, our organisation recognises that it has a responsibility to take a robust approach to slavery and human trafficking.

The organisation has not previously consciously committed to preventing slavery and human trafficking in our corporate activities, and to ensuring that our supply chains are free from slavery and human trafficking. This has now changed.

## Organisational Structure and Supply Chains

The companies are RS Response Limited and RSR Interiors Limited. The companies operate across a number of subsectors within the UK construction and property industry, undertaking general electrical design and installation projects, office interiors installation projects, maintenance and ancillary activities.

The majority of our services are delivered through an extended local supply chain, providing both labour, plant and materials.

## Countries of operation and supply

The organisation operates solely in the UK.

## High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Involvement of slave labour in the production of certain materials imported from overseas.

## Responsibility

Responsibility for the organisation's anti-slavery initiatives is as:

- **Policies:** The Directors are responsible for the establishment of the policy.
- **Risk assessments:** Risk assessments are undertaken by our procurement department and the managers responsible for vetting our subcontractors.
- **Investigations/due diligence:** Investigations and due diligence will be undertaken by our procurement department and managers involved with the use of agency workers.
- **Training:** Awareness training will be organised through our HR department and will focus on training our senior managers.

## Relevant Policies

The company operates the following policies that will describe its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations once these policies are reviewed annually:

- **Whistleblowing Policy:** The company will encourage all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains, of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees,



customers or others who have concerns are encouraged to contact the Managing Directors of the organisation.

- **Supply Chain Code of Conduct:** The organisation is committed to ensuring that its supply chain adheres to the highest standards of ethics. Suppliers and subcontractors are required to demonstrate that they provide safe working conditions, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The company works with its supply chain to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our Supply Chain Code of Conduct will lead to the termination of the business relationship.
- **Agency Workers Policy:** There is no specific Agency Workers Policy in operation. Our organisation uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency it is proposing to use before accepting workers from that agency. All our labour is required to be CSCS accredited, which we believe reduces the risk of slave labour.

## Due Diligence

The company has not to date but will undertake due diligence exercises with our supply chain as our policy and knowledge develops. The due diligence and reviews may include:

- Evaluating the modern slavery and human trafficking policies of supply chain members;
- Understanding the steps taken by our supply chain in investigating, identifying and preventing human slavery and trafficking within their recruitment practices;
- Participating in collaborative initiatives focused on human rights in general, and slavery and human trafficking in particular; and
- Invoking sanctions against any supplier or subcontractor that fails or breaches the legislation requirements in the UK, or who seriously violate our Supply Chain Code of Conduct, including the termination of the business relationship.

## Awareness-raising Programme

The company will raise awareness by providing information on:

- The basic principles of the Modern Slavery Act 2015;
- How employers can identify and prevent slavery and human trafficking;
- What external help is available, for example through the Modern Slavery Helpline.

## Board Approval

This statement has been approved by the Managing Directors, who will review and update it annually.

12<sup>th</sup> November 2018

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