

# Anti-Slavery & Human Trafficking Policy

RLC: Policy and Procedure

Group Policy: GP -05-03

**Policy Approvals:**

**Group Board:**

**Date: 8 September 2022**



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This policy applies to RLC Engineering Group Limited (Group Parent Company), RLC Aerospace Limited, Ronaldsway Aircraft Company Limited, RLC Langford Lodge Limited, RLC (UK) Limited and RLC Group (Singapore) Pte. Ltd together with any other subsidiary or holding companies that may be set up in the future (together “RLC”).

## **(1) Policy Statement**

**RLC have a zero-tolerance approach to modern slavery and RLC are committed to acting ethically and with integrity in all RLC business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in RLC’s business or in any of its supply chains. RLC are also committed to ensuring there is transparency in RLC’s business and its approach to tackling modern slavery throughout RLC supply chains, consistent with RLC’s disclosure obligations under the Modern Slavery Act 2015.**

RLC expect the same high standards from all RLC contractors, suppliers and other business partners, and as part of RLC’s contracting processes, RLC include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and RLC expect that its suppliers will hold their own suppliers to the same high standards.

This policy applies to all persons working for RLC or on RLC’s behalf in any capacity, including all employees, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

This policy does not form part of any employee's contract of employment and RLC may amend it at any time.

The responsible officer at each RLC Site shall be the site leader with one of the following titles of Operations General Manager , General Manager , or Managing Director (the ‘Responsible Officer’).

## **(2) Compliance**

You must ensure that you read, understand and comply with this policy.

The prevention, detection and reporting of modern slavery in any part of RLC’s business or supply chains is the responsibility of all those working for or under the control of RLC. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

You must notify the Responsible Officer or the RLC Group Company Secretary as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.

You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of RLC’s business or supply chains of any supplier tier at the earliest possible stage.

If you are unsure about whether an act, the treatment of workers more generally, or their working conditions within any tier of RLC’s supply chains constitutes any of the various forms of modern slavery, raise it with the Responsible Officer or the RLC Group Company Secretary.



RLC aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. RLC are 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 RLC’s business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your HR Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

### **(3) Communication & Awareness**

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us, and regular training will be provided, as necessary.

RLC’s zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of an RLC business relationship with them and reinforced as appropriate thereafter.

### **(4) Breaches**

Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

RLC may terminate our relationship with other individuals and organisations working on RLC’s behalf if they breach this policy.

### **Policy Revision History Log**

<b>Version</b>	<b>Revision   Description of changes</b>	<b>Change owner</b>	<b>Effective Date</b>
GP-05-01	Policy and Procedure approved by RLC Group Board	RLC Group Company Secretary	11 March 2020
GP-05-02	Review and Update of Policy. Approved by RLC Group Board	RLC Group Company Secretary	27 October 2021
GP-05-03	Review and Update of Policy. Approved by RLC Group Board	RLC Group Company Secretary	8 September 2022