



## MODERN SLAVERY STATEMENT

Rawle Gammon and Baker Holdings Limited (RGB) recognise that modern slavery is a problem that could potentially affect anyone, and that as an organisation, we have a responsibility and obligation to understand and eliminate the risks.

### Responsibility for Anti-Slavery Initiatives

The Board of Directors have the ultimate responsibility (within RGB) for tackling the problem of modern slavery. The day to day work will be undertaken by the Product Team, senior managers, managers and all staff of RGB.

Any concerns relating to modern slavery should be raised with the HR Director.

### Our commitment to tackling modern slavery

At RGB we manage the risk of modern slavery within our own business by:

- Ensuring all employees are over the school leaving age
- Undertaking identification and right to work checks
- Allowing employees to terminate their employment at any time
- Training staff on modern slavery issues
- Making a Health and Safety Statement available to all employees (and we do what it says)
- Promoting a culture of openness and honesty in line with Corporate Social Responsibility
- Raising the awareness of what constitutes unacceptable behaviour (e.g. by discussing and acknowledging the difference between Bullying vs Banter)
- Setting pay levels above living wage

We also manage the risk of modern slavery within our supply chains by:

- Training staff on the potential for modern slavery in the supply chain
- Adopting and adhering to the modern slavery codes of conduct promoted by any buying groups of which we are members
- Maintaining an awareness of the risks of modern slavery within the supply chain by educating staff on indicators that may suggest the existence of slavery (Appendix 1).  
Where potential slavery is identified:
  - Undertake an investigation to ascertain the facts
  - If slavery is believed to exist, take appropriate action
- Promoting an awareness of Corporate Social Responsibility by adopting initiatives such as Chain of Custody (CoC)

This statement is made pursuant to Section 54 (1) of the Modern Slavery Act 2015 and relates to the financial year ending 31<sup>st</sup> March 2020.

**JENNY NAYLOR, HR Director**

Date: 25<sup>th</sup> March 2019

## Appendix 1

# Indicators that may suggest the existence of slavery

## Within RGB

Within RGB, indicators suggesting the existence of modern slavery could include:

1. Unsatisfactory identification or right to work checks
2. Requests for payment to be made into an alternative bank account
3. Comments or actions of staff, which may include:
  - a. No or restricted access to wages
  - b. Abuse of staff account
  - c. Comments about home life
    - i. Forced to carry out housework and domestic chores
    - ii. Restricted movement
    - iii. Limited or no free time
    - iv. Minimal privacy
  - d. Dropped off or collected from work on a regular basis (either very early or late at night)
  - e. Few or no personal effects
  - f. Regularly smelly or unwashed
  - g. Repeatedly wearing the same clothes, some of which may not be suitable for work

## Within the supply chain

Within the supply chain, indicators suggesting the existence of modern slavery could include:

1. Reports in the media
2. Offhand comments made by supplier or manufacturer representatives or observations during factory visits which may include:
  - a. High levels of poverty
  - b. Restriction of food, water or sleep
  - c. Fewer protections through laws or regulations
  - d. Widespread discrimination against certain types of workers
  - e. Widespread use of migrant workers

The indicators listed above are not exhaustive. Any suspicion of the existence of slavery should be raised with the HR Director.