

## MODERN DAY SLAVERY ACT 2015 POLICY STATEMENT

Reds10 (UK) Ltd. recognises that slavery and human trafficking remain a hidden blight on our global society. The aim of the Company is to identify our responsibility by alerting staff to the risks, however small, in our business and in the wider supply chain. Staff are expected and encouraged to report concerns to management, where they are expected to act upon them.

Company activities are varied through multiple disciplined areas and sectors such as construction and FF&E. Likewise, we have a multi-disciplined supply chain to support us through the different aspects and provisions of our business.

We are committed to ensuring that there is no modern-day slavery or human trafficking in our supply chains or in any part of our business. Our Modern Slavery Policy Statement reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain nor in any part of our business.

### Responsible Employer

As a responsible employer, we take the welfare of our employees (and others working on our behalf) seriously. Our whistleblowing policy encourages employees to report wrongdoing (including exploitation) in any form. We are committed to investigating all matters raised through our whistleblowing policy via robust and transparent processes.

We are committed to providing a great place to work for our staff and this is at the heart of our business strategy. We comply with local minimum age and wage laws and do not employ child labour. All our employees (i.e. those who are paid directly via Reds10) are/have:

- Paid by bank transfer; we do not allow payment to be made into third party bank accounts, thus minimising the risk of forced or compulsory labour. All ISG employees must receive details of hours worked/pay (within their payslips) when they are paid and this must also clearly show deductions for tax and NI contributions; and
- Vetted for the right to work in the UK. Where employees require a work permit/VISA we ensure they have the necessary documentation in place.
- Able to decide when they wish to leave their employment with Reds10
- The Freedom of movement
- Not asked to give us any of their original work documents when they are taken on board
- Vetted for their age as we prohibit child labour
- To adhere to our values, behaviours as we do not accept threatening behaviour or harassment of any kind
- The right to join any association they wish

### Policy aims

This Policy takes into account, and supports, the policies, procedures and requirements documented in our Integrated Management System, compliant with the requirements of ISO9001:2008 and ISO14001:2015. The implementation and operation of this management system underlines our commitment to this policy statement. Formal procedures concerning slavery and human trafficking have been established, including disciplinary procedures where they are breached. Additional procedures ensure that this policy is understood and communicated at all levels of the company, and that it is regularly reviewed by the Directors to ensure its continuing suitability and relevance to the company activities.

**R10-P 4.18.05 Modern Slavery Act Policy**

The company will achieve these aims by our initiative to identify and mitigate risk in the following ways (but not limited to):

- More stringent vetting and investigation of our supply chain (contractors, sub-contractors, policies, contracts etc.)
- Continually audit and review our practices to ensure all employees are paid at least the minimum wage and have the right to work;
- Continually audit and review our supply chains practices to ensure they comply with our standards
- Encourage the reporting of concerns and the protection of whistleblowers. A confidential helpline has been implemented where any staff member or sub-contractor can report a modern slavery or trafficking concern onsite or in any of our offices or supply chain partners
- The company will not knowingly support or deal with any business involved in slavery or human trafficking.
- We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values.

**Risks**

Our primary risk area is within the highly tiered supply chain structure relating to construction delivery. Therefore, achieving transparency of labour employment arrangements and sourcing of materials are key challenges. Matt Bennion, CEO, alongside the Leadership team, Commercial Team and HR Team, each support implementation of the Reds10 approach to tackling modern slavery.

The Global Slavery Index provides significant evidence that labour standards risks could be present in construction and property supply chains, in the production of construction materials, delivery of construction activities and through the provision of professional services equipment such as laptops and phones. To identify and mitigate the risks of slavery and human trafficking, Reds10 makes informed decisions regarding the procurement and management of labour, goods and services, utilising the following:

- Clear definition and contractual terms setting out our expectations of our suppliers
- Identification of issues and risks to inform procurement decisions.
- Use of prequalification tools to assess UK contractor and supplier compliance; and further due diligence of international suppliers. Our PQQs assess suppliers against labour standards, health and safety, environmental and business ethics criteria, identifying issues and risks.
- Training and supplier development.
- Compulsory training for all Reds10 staff and construction supplier leadership teams on slave labour and human trafficking risks and how to spot the signs of potential issues.
- Collaboration with our clients, peers and suppliers to ensure risks are minimized
- Reds10 encourages team to speak out about any concerns they have, staff and subcontractors are encouraged to bring any concerns to the Reds10 Leadership or use our Whistleblowing helpline operated by Safecall. All reports will be investigated by Safecall and the Reds10 Directors.

To ensure high levels of understanding of these risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff as well as to our supply chain partners through toolbox talks. All Directors have been briefed on the subject, so have our team leaders and our supply chain partners through our PQQ process at the start of our relationship with them but also all the way through our relationship.

**R10-P 4.18.05 Modern Slavery Act Policy****KPIs**

We use the following key performance indicators (KPIs) to measure how effective we have been to ensure that modern slavery and human trafficking are not taking place in any part of our business or our supply chains:

- Completion of Audits by Directors and Safety Advisors of our supply chain
- Use of labour monitoring and payroll systems
- Monitoring of any modern slavery or trafficking reports through our Directors or our Confidential helpline
- Continually review our contracts with our supply chain as well as our policies, procedures and PQQs when dealing with all our supply chain to ensure they are going above and beyond to check for and mitigate or eliminate risks of modern slavery and trafficking
- Ensure all our teams and supply chain are trained on spotting signs of modern slavery and human trafficking and are fully aware of our policies and our whistleblowing procedures
- Ensure our policies are always up to date to reinforce our zero tolerance to modern slavery
- Ensure all our supply chain provides us with their own Modern Slavery policy and if it is not up to our standards, demand that it be updated and their systems upgraded before we work with them
- Do our due diligence
- Risk assess ourselves yearly to ensure we are not introducing any risks to the business

**Due diligence processes**

As part of our sub-contractor due diligence pre-qualification (PQQ) procedures, within the UK, we vet our sub-contractors through a due diligence process. All potential new sub-contractors who progress through our pre-qualification process are required to provide all the documentation that will give us comfort that they have the highest standards in regards to modern slavery and human trafficking, ensuring they also have processes and practices in place to mitigate any risks.

However, we acknowledge there is still far more work to do within our supply chains. We are committed to ensuring that all our supplier groups, wherever they are working, are vetted properly and that if they work with a supply chain, they have proof of their vetting system for them.

As part of our due diligence, we also ensure that all workers working for our supply chain have been employed ethically and according to UK laws and processes. We regularly audit the workers to ensure they are not working against the law. We regularly audit the workers since to them on our helplines and our policies if they require any assistance, through toolbox talks. We would not work with any unethical labour agency or supplier group and thus have the systems in place to monitor workers to ensure there is no modern slavery and trafficking happening.

This policy is in accordance with Section 54 of the Modern Slavery Act 2015 and constitutes our groups slavery and human trafficking statement.



**Matt Bennion**  
CEO Reds10 (UK) Limited

**Dated 01/01/2024**

This policy applies to all employees, temporary workers, consultants, contractors or agents, subsidiaries and associated companies acting on the behalf of the Company.