



POLICY

MODERN SLAVERY

1. POLICY STATEMENT

- 1.1 RBLI operates a zero tolerance approach to modern slavery both within the organisation and within our supply chains. The organisation respects fundamental human rights and is committed to the principles set out in the United Nations Universal Declaration of Human Rights and Modern Slavery Act 2015. We support and respect the protection of human rights within our sphere of influence.
- 1.2 RBLI is committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for and on behalf of the Company and expect it of all with whom we have business dealings.

2. PURPOSE & SCOPE

- 2.1 The purpose of this policy is to ensure:
 - 2.1.1 That modern slavery does not occur within any Company activity
 - 2.1.2 That modern slavery does not occur within any organisations as part of any Company supply chains
 - 2.1.3 That employees understand the mechanism for reporting any concerns relating to modern slavery
 - 2.1.4 That the organisation has effective systems and controls in place to assess associated risk in relating to modern slavery
- 2.2 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, trustees, agency workers, seconded workers, volunteers, contractors, external consultants, freelancers, third-party representatives and business partners

3. WHAT IS MODERN SLAVERY?

- 3.1 Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the “Act”). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

4. ROLES & RESPONSIBILITIES

- 4.1 **Senior Management Team (SMT)**
The SMT have overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control (including supply chain partners)

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comply with it. All Directors have day-to-day responsibility for implementing this policy, monitoring its use and effectiveness, dealing with any queries about it, and auditing internal control systems and procedures to ensure they are effective in combating modern slavery.

4.2 Management

Managers at all levels are responsible for ensuring those reporting to them have access to and understand and comply with this policy, and that all supply chain partners or third party organisations have sufficient policies and practices in place to support the prevention of modern slavery.

4.3 Employees

All employees are responsible for:

- 4.3.1 ensuring that they are aware of, understand and comply with the contents of this policy.
- 4.3.2 raising concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains in a timely manner.

5. SUPPLY CHAIN PARTNERS

- 5.1 Whilst recognising our statutory obligation to set out the steps we have taken to ensure that modern slavery and human trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains.
- 5.2 In the event any prospective partner represents an unacceptable risk, RBLI will consider it our responsibility to work with such partners (as far as is reasonably practical) to assist them in implementing a policy and reducing their risk.
- 5.3 Our zero-tolerance approach to modern slavery must be communicated to all supply chain partners and third party organisations at the outset of our business relationship with them and reinforced as appropriate thereafter.

6. STEPS FOR THE PREVENTION OF MODERN SLAVERY

- 6.1 The Company is committed to ensuring transparency throughout its divisions and in our approach to tackling modern slavery in all activity undertaken on behalf of the Company. To underpin our compliance with practical steps, the Company will:
 - 6.1.1 actively encourage a culture of 'speaking up' for all individuals associated with the Company, to enable the timely and effective reporting of any modern slavery concerns
 - 6.1.2 ensure that individuals understand the process of reporting any modern slavery concerns

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- 6.1.3** conduct risk assessments to determine which parts of our business are most at risk of modern slavery so that improvement efforts can be focused on those areas;
 - 6.1.4** where necessary, undertake internal audits to assess any risk associated with modern slavery
- 6.2** We have in place supply chain compliance and risk management activities to mitigate the risk of slavery occurring in our supply chains, allowing us to assess, identify, address and monitor risk areas. This consists of:
 - 6.2.1** carrying out risk assessments for new and current supply chain partners
 - 6.2.2** reviewing and assessing the partners' own modern slavery policies and procedures
 - 6.2.3** regular audits to check compliance with our policies and procedures.
 - 6.2.4** applying enhanced checks and subsequent action plans where higher-risk areas are identified.
- 6.3** Where risk assessments or audit checks are returned containing unsatisfactory factors, the Company may decide not to undertake certain business activities, or work with third party organisation. Alternatively the Company may seek further information, or assurances, before proceeding.

7. REPORTING CONCERNS

- 7.1** Employees are encouraged to raise any concerns about suspected modern slavery associated with the Company or our partners and should do this either through their line manager or by speaking to a member of the HR Department.
- 7.2** Members of the public or people not employed by the Company can write in confidence to the Director of Finance and Corporate Service (at the Company's registered office) to raise any concern, issue or suspicion of modern slavery in any part of our business or related partners.
- 7.3** We 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. We 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 our own business or in any of our partners. Any disclosures presented in good faith will be protected under the Company's whistleblowing policy.
- 7.4** The Company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more



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difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

8. BREACHES OF THIS POLICY

- 8.1 Any employee who breaches this policy will face disciplinary action, up to and including summary dismissal.
- 8.2 If an issue is identified with a partner, we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period.
- 8.3 We reserve the right to terminate our relationship with individuals and organisations if they are found to have breached this policy.

9. RELATED DOCUMENTS

- Code of Ethics & Professional Conduct
- Safeguarding of Vulnerable Groups Policy
- Whistleblowing Policy

This policy will be regularly reviewed to ensure compliance with statutory requirements. Any queries regarding this policy, or comments, should be addressed to your line manager or the HR department.

Originator's Signature:

A handwritten signature in black ink, appearing to read 'Steve Sherry', with a stylized flourish at the end.

Name:

Steve Sherry

Position in Company:

Chief Executive