



# **Modern Slavery Policy**

July 2025

Version 5

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## **Policy Commitment**

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Ganymede has a zero-tolerance approach to all forms of modern slavery, and we are committed to acting legally, ethically and with integrity in all our business dealings and relationships. We seek to adopt and develop a proactive approach to prevent and remediate the risks of modern slavery, forced and debt-bonded labour, human trafficking and hidden exploitation within our workforce.

We expect all who have, or seek to have, a business relationship with Ganymede to familiarise themselves with this policy and to act at all times in a way that is consistent with its values.

This policy will be used to underpin and inform any statement on Slavery and Human Trafficking that we or our Parent Company RTC Group PLC produce further to the transparency in supply chain requirements of Section 54 of the Modern Slavery Act (MSA) 2015.

## **Scope of this Policy**

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This policy applies to all persons working for or on behalf of Ganymede in any capacity, including employees, directors, officers, workers, contractors, consultants, and Ganymede's supply chain.

This policy will be reviewed by the Managing Director at least once a year.

This policy does not give contractual rights to individuals, and we reserve the right to alter any of its terms at any time, although we will notify applicable parties of any changes. Any updated versions will be made available to all employees and notified to persons covered by the scope of the policy.

## **What do we mean by Modern Slavery?**

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Modern slavery can take many forms. It is a complex and multi-faceted crime and therefore it is important to understand what we mean by modern slavery. Detailed below are important definitions that everyone should understand:

**Modern slavery** is a broad term used to encompass offences that involve one person depriving another person of their liberty, to exploit them for personal or commercial gain.

**Forced labour** is all work or service that is exacted from any person under the menace of any penalty and for which the said person has not offered themselves voluntarily.

**Debt-bonded labour** is where a person's labour is demanded as a means of repayment for a loan or service.

**Human trafficking** is the recruitment and transportation of persons by threat, force, coercion or other abuse of power or vulnerability to achieve the consent of a person having control over another person for the purpose of exploitation.

**Hidden labour exploitation** is action up to and including modern slavery which involves the exploitation of workers and job applicants by internal or external individuals without the sanction or explicit knowledge of the employer or labour provider.

Other forms of slavery, which we will not tolerate, but are not specifically referenced in the MSA 2015 include, but are not limited to:

**Child labour** involves the employment of children that is exploitative, or is likely to be hazardous to, or interfere with, a child's education, health (including mental health), physical wellbeing or social development.

All forms of modern slavery have in common the deprivation of a person's liberty by another in order to exploit them for commercial or personal gain and amount to a violation of an individual's fundamental human rights.

Tackling modern slavery requires us all to play a part and remain vigilant to the risk in all aspects of our business and business relationships.

## Indicators of Forced Labour

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The International Labour Organisation's (ILO) 11 indicators of forced labour are intended to help us to identify persons who are possibly trapped in a forced labour situation, and who may require urgent assistance. The indicators represent the most common signs or "clues" that point to the possible existence of a forced labour case.

**Abuse of vulnerability** is when an employer takes advantage of a worker's vulnerable position, such as those with a lack of knowledge of the local language or laws, those with limited livelihood options, those belong to a minority religious or ethnic group or those who have a disability or have other characteristics that set them apart from the majority population.

**Deception** is when individuals are recruited with promises of decent, well-paid jobs. But once they begin working, the promised conditions of work do not materialize, and workers find themselves trapped in abusive conditions without the ability to escape.

**Restriction of movement** is when workers are not free to enter and exit the work premises, without being subject to certain restrictions. This could include workers having their movements controlled inside the workplace, through the use of surveillance cameras or guards, and outside the workplace by agents of their employer who accompany them when they leave the site.

**Isolation** is when victims of forced labour are isolated in remote locations, denied contact with the outside world. This could include being kept behind closed doors or having their mobile phones or other means of communication confiscated.

**Physical and sexual violence** is when workers, their family members and close associates are subjected to actual physical or sexual harm. This can include being forced to take drugs or alcohol, undertake inappropriate tasks that were not part of the initial agreement, or kidnapping and being held captive.

**Intimidation and threats** are used when workers complain about their conditions or wish to quit their jobs such as threats of physical violence, denunciation to the immigration authorities, loss of wages or access to housing, further worsening of working conditions or withdrawal of “privileges” such as the right to leave the workplace.

**Retention of identity documents** is when an employer retains identity documents or other valuable personal possessions, and workers are unable to access these items on demand or feel that they cannot leave the job without risking their loss.

**Withholding of wages** is when workers may be obliged to remain with an abusive employer whilst waiting for the wages that are owed to them. Wages are systematically and deliberately withheld as a means to compel the worker to remain, and deny them the opportunity to change employer.

**Debt bondage** is when workers are forced into labour to pay off an incurred or sometimes even inherited debt. The debt can arise from wage advances or loans to cover recruitment or transport costs or from daily living or emergency expenses, such as medical costs.

**Abusive working and living conditions** describe when workers are forced to perform labour under conditions that are degrading (humiliating or dirty) or hazardous (difficult or dangerous without adequate protective gear), and in severe breach of labour law. Forced labourers may also be subjected to substandard living conditions, made to live in overcrowded and unhealthy conditions without any privacy.

**Excessive overtime** is when workers are forced to work excessive hours or days beyond the limits prescribed by national law. They can be denied breaks and days off, having to take over the shifts and working hours of colleagues who are absent, or by being on call 24 hours a day, 7 days a week.

## How we seek to embed our modern slavery policy in practice

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To underpin our policy commitment, we have introduced the following measures:

- Raised awareness of modern slavery, through our induction training, and modern slavery policy statement
- Implemented a Responsible Recruitment Policy, which details our commitment to recruiting responsibly and never charging fees for our services
- Produced our Compliant Recruitment Principles which all employees involved in the recruitment or deployment of temporary workers are required to sign up to
- All potential suppliers are pre-screened through our Approved Supplier Process which includes questions in relation to their existing safeguarding controls and practices in relation to preventing modern slavery occurring within their organisation
- Completion of a Modern Slavery Risk Assessment of our supply chain to highlight potential high risk suppliers and rolled out due diligence questionnaires to suppliers identified as high risk so we can evaluate them in more detail
- Developed our Code of Business Ethics which aims to outline our ethical business practices including our commitment to preventing Modern Slavery
- Our modern slavery steering group continues to meet quarterly to review the actions we have taken to date including reviewing progress against our KPI's and identifying and implementing further best practice
- Appointed volunteers from within the business to become Modern Slavery Champions to help raise awareness of modern slavery to our employees, workers and contractors and promote the different ways concerns can be reported along with suspicions of exploitation

- Joined the FCSA Recruiter Partner Network, demonstrating we only use FSCA accredited payroll companies which require businesses to confirm steps taken to prevent slavery and exploitation within their supply chain and continue to audit our payroll companies to confirm that they are undertaking checks to ensure that temporary workers/contractors are not being subjected to slavery, human trafficking or exploitation

In addition we:

- Continue to utilise Supply Chain Sustainability School and Stronger Together toolkits and other resources to ensure that we are utilising the most up to date resources to help eliminate the risk of modern slavery
- Continue to work to robust placement processes which include compliance checks and identity checks, these processes are reviewed in line with changes in legislation and best practice
- Achieved and maintained certification to the Achilles Ethical Business Programme
- Continue to review and update internal recruiter specific modern slavery training, providing refresher training for all employees further raising awareness of modern slavery and human trafficking risks to our business
- Completed the GOV.UK Modern Slavery Assessment Tool (MSAT) and implemented actions to further improve our score

### **Responsibility for this Policy**

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The Managing Director has overall responsibility for this policy and in ensuring that the Company complies with all its legal and ethical obligations.



The HR Department will have the primary day-to-day responsibility for the implementation of this policy, monitoring its use and ensuring that the appropriate processes and control systems are in place, and amended as appropriate, to ensure it can operate effectively.

All line managers are responsible for ensuring that those reporting directly to them comply with the provisions of this policy in the day-to-day performance of their roles.

### **Communication and employee awareness training**

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The HR Department will ensure that all staff receive adequate training on this policy and any supporting processes applicable to their role. Such training forms part of the Company's induction processes, which is refreshed annually.

In addition, staff will receive training on the broader issues of modern slavery so as to assist them in appreciating the extent of the problem of modern slavery and help identify the individuals/areas of the business that may be at risk from practices of modern slavery.

### **How to raise a concern**

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There are a number of ways in which to raise a concern that modern slavery may be occurring in our business or in our supply chain, the procedure/process used will depend on your circumstances and the issue that you are concerned about. You can utilise the following formal procedures to raise a concern:

- Reporting a suspected instance of Modern Slavery process
- Grievance Procedure
- Whistleblowing Procedure
- Complaints Procedure
- Close Call System

Alternatively, you may discuss your concerns with your manager/point of contact or the HR department.

### **Breaches of this Policy**

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Any breaches of this policy will be taken seriously and dealt with on a case-by-case basis. The breach of this policy by an employee, director or officer of Ganymede may lead to disciplinary action being taken in accordance with the Disciplinary Procedure. Serious breaches will be regarded as gross misconduct and may lead to immediate dismissal in accordance with our disciplinary procedure. Serious breach by agency workers, contractors, or consultants, may lead to their assignment/contract being terminated. Serious breaches by suppliers may lead to their removal from our Approved Supplier list.

Everybody to whom this policy applies will be expected to co-operate to the fullest extent possible in any investigation into suspected breaches of this policy or any related processes or procedures.

If any part of this policy is unclear, clarification should be sought from the HR Department.

## Document Control

This policy will be reviewed annually and a record kept by the HR Team, only if changes are required will a new version be created and the policy be reissued.

V	DATE	AMENDMENTS	APPROVED BY	SIGNATURE
1	Feb 2021	Separate Ganymede Policy created (previously this was an RTC Group policy)	Paul Crompton	P.S. 
2	Mar 2022	Policy reviewed, title changed from Anti-Slavery to Modern Slavery and ILO Indicators of forced labour added. Layout up dated and revised document control added.	Paul Crompton	P.S. 
3	June 2023	Policy reviewed, updates made to actions taken to embed our modern slavery policy in practice	Paul Crompton	P.S. 
4	July 2024	Policy reviewed, updates made to actions taken to embed our modern slavery policy in practice	Paul Crompton	P.S. 
5	July 2025	Policy reviewed, updates made to actions taken to embed our modern slavery policy in practice	Paul Crompton	P.S. 