

# Anti-Slavery, Human Trafficking & Illegal Workers Policy

## Introduction

Record UK Ltd recognizes that slavery, human trafficking and illegal workers are a serious concern in society. This Policy Statement sets out our commitment to preventing slavery, human trafficking and illegal workers in our business activities and outlines the steps we have put in place to ensure that there is no slavery, human trafficking or illegal workers in our own business and supply chains.

## Definition of Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. Modern slavery includes:

- Slavery
- Servitude
- Forced / compulsory labour
- Human Trafficking
- Any other deprivation of a person's liberty to create a personal or commercial gain.

## Scope

This policy applies to all persons working for Record UK, on our behalf, or in any capacity associated with our business. This includes:

- All employees
- Directors
- Agency workers
- Contractors
- Suppliers

## Policy

Record UK recognises that the delivery of our services involves labour being procured throughout our business and supply chains and understand that this entails the risk that modern slavery may take place.

We acknowledge that modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and 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.

We have a zero-tolerance approach to modern slavery, and we are committed to acting ethically and with integrity in all of our business undertakings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery is not taking place anywhere in either our own business, or in any of the businesses of our supply chains.

In adhering to this policy, in particular we will: -

- Include, as part of our contracting processes within our supply chain, obligations to ensure compliance with the requirements of the Modern Slavery Act 2015.
- Encourage openness and provide support to anyone who raises genuine concerns in good faith under this policy. We are committed to ensuring that no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever forms, or may be, taking place in any part of our own business or in the businesses of any of our supply chains.

### **Illegal Working**

Record UK carry out appropriate VISA, Passport and DOB checks to ensure all employees are entitled to work in the UK in accordance with Sections 15 to 25 of the Immigration, Asylum & Nationality Act 2006.

Should a non-EU resident apply to work with us, as identified by pre-employment screening questions, a copy of their work visa and passport would be required. All necessary checks would then be made to ensure the person had the right to work in the UK and they have no immigration restrictions that prevent them from doing the work in question.

Should a potential employee's right to work in the UK be on a temporary basis, additional checks will be carried out to ensure that their documents have been renewed prior to them commencing employment to prevent a situation where their working rights would expire during their period of employment.

Documents used to verify right to work are compliant with the Home Office Guidance for Employers on Preventing Illegal Working and are retained for a minimum of 2 years after the individual has ceased employment with the Company.

### **Responsibility**

Record UK's Key Leadership team have overall responsibility for ensuring this policy complies with our legal and ethical obligations, including any person or organisation under the Company's control. Our Head of HR and HSEQ Team have joint primary and day-to-day responsibility for implementation, continually measuring its use and effectiveness. All internal audits and controls are undertaken by the team.

Management throughout the business are responsible for ensuring the policy is cascaded and complied with, especially those involved in the management and appointment of suppliers and contractors.

### **Training and Awareness**

Record UK provides essential training for all employees to provide a detailed understanding of the risks of modern slavery, human trafficking and illegal workers on our business and supply chains.

## **Compliance**

All employees, suppliers and contractors must read, understand and comply with this policy.

Prevention, detection and reporting of any instance which may be deemed as modern slavery, in any part of our business or supply chains, is the responsibility of anybody appointed to work on behalf of the company, directly employed or otherwise appointed.

You must notify your line manager, HR/HSEQ team immediately if you believe or suspect a conflict of this policy has or may occur.

You are encouraged to raise concerns as soon as possible and will be appropriately protected in a confidential, anonymous nature for doing so.

If you are unsure of a suspicious event constitutes modern slavery, please raise it with you line manager immediately.

## **Breaches**

We encourage the reporting of concerns and the protection of whistleblowers.

Record 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 comply with our values.

Suspected breaches of this policy will be fully investigated and dealt with either by Record UK disciplinary procedures or Contractual Supply Chain agreements.

## **Communication**

This policy is communicated in line with our Communications Policy to all employees, our supply chain and to any other interested parties upon request. Revisions will be communicated to those affected by the changes. Stakeholders are expected to co-operate and assist in the implementation of this policy.

## **Review**

This policy and supporting processes are pursuant to section 54(1) of the Modern Slavery Act 2015 and shall be reviewed annually for each year or after changes in legislation and operations, whichever occurs first.