

R&M POLICY · PEOPLE AND ETHICS

Anti-Slavery and Human Trafficking Policy

R&M Property Group Ltd

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1. Director's Statement

R&M Property Group Ltd has a zero-tolerance approach to modern slavery and human trafficking. We are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure that modern slavery and human trafficking are not taking place anywhere within our business or in any part of our supply chain.

The construction industry is recognised by the UK Government, the Gangmasters and Labour Abuse Authority (GLAA), and the International Labour Organisation as a sector at elevated risk of labour exploitation, forced labour, and human trafficking. The industry's reliance on subcontracted labour, agency workers, migrant workers, and complex supply chains creates conditions in which exploitation can occur and can be difficult to detect. R&M takes this risk seriously and has put in place the policies, procedures, and training necessary to identify and prevent modern slavery in all its forms.

As a developer working within public sector frameworks, R&M delivers projects on behalf of local authorities, housing associations, and other public bodies. These Client Organisations expect the highest standards of ethical employment practice throughout the delivery chain. This policy demonstrates our commitment to meeting and exceeding those expectations.

Thom McKenna, Director, R&M Property Group Ltd

2. Definitions - What is Modern Slavery?

Modern slavery is a serious criminal offence and a violation of fundamental human rights. It takes various forms, all of which deprive a person of their liberty in order to exploit them for personal or commercial gain. The Modern Slavery Act 2015 consolidates and strengthens existing offences relating to slavery, servitude, forced or compulsory labour, and human trafficking. The principal offences are:

- **Slavery, servitude, and forced or compulsory labour (Section 1):** A person commits an offence if they hold another person in slavery or servitude, or require another person to perform forced or compulsory labour. Forced labour means work or service that is exacted under the menace of any penalty and for which the person has not offered themselves voluntarily. Indicators include excessive working hours, restriction of movement, withholding of wages or documents, debt bondage, threats of violence, and deception about the nature or conditions of work.
- **Human trafficking (Section 2):** A person commits an offence if they arrange or facilitate the travel of another person with a view to that person being exploited. Exploitation includes slavery, servitude, forced labour, sexual exploitation, and the removal of organs. The victim's consent is irrelevant where any of the means of trafficking (force, fraud, deception, coercion, abuse of power, or abuse of a position of vulnerability) have been used.

Modern slavery also encompasses practices such as child labour, domestic servitude, and labour exploitation where workers are subjected to conditions that fall below the standards required by law and are unable to leave or assert their rights because of coercion, deception, or abuse of vulnerability. In the construction context, common forms of exploitation include workers being paid below the minimum wage, excessive deductions from wages for

accommodation or transport, confiscation of identity documents, and workers being controlled by a third party who takes all or most of their earnings.

3. Legal Framework

This policy is informed by and ensures compliance with the following legislation:

- **Modern Slavery Act 2015:** The principal UK legislation. It creates the offences of slavery, servitude, forced labour, and human trafficking, establishes the role of the Independent Anti-Slavery Commissioner, introduces Slavery and Trafficking Prevention Orders and Risk Orders, and (in Section 54) requires commercial organisations with a turnover of thirty-six million pounds or more to publish an annual Modern Slavery Statement. Although R&M's turnover is currently below the Section 54 threshold, R&M voluntarily adopts the transparency principles of Section 54 as a matter of good practice and in recognition of the expectations of public sector clients.
- **Gangmasters (Licensing) Act 2004 and Immigration Act 2016:** The GLAA regulates businesses that supply workers in sectors including construction. The Immigration Act 2016 extended the GLAA's remit to cover labour abuse across the entire economy, giving it police-style powers to investigate serious labour exploitation. R&M only engages licensed labour providers where licensing is required by law and requires all employment agencies to demonstrate compliance with the Employment Agencies Act 1973 and the Conduct of Employment Agencies and Employment Businesses Regulations 2003.
- **Human Rights Act 1998:** Article 4 of the European Convention on Human Rights (as incorporated) prohibits slavery, servitude, and forced labour. Article 4 imposes both a negative obligation (not to subject anyone to slavery or forced labour) and a positive obligation on the state and public authorities to take operational measures to protect victims.
- **Procurement Act 2023:** Modern slavery offences constitute mandatory exclusion grounds for public sector procurement. A supplier convicted of a modern slavery offence, or with a director or officer so convicted, is excluded from bidding for or being awarded public contracts. R&M's compliance with this policy is essential to maintaining its eligibility for public sector framework work.
- **Immigration, Asylum and Nationality Act 2006:** Places a duty on employers to verify the right to work of all employees. Workers without a legal right to work are particularly vulnerable to exploitation. R&M's Right to Work Verification Policy operates alongside this anti-slavery policy to protect vulnerable workers.

4. Scope

This policy applies to:

- All directors, employees, and workers of R&M Property Group Ltd.
- All subcontractors, suppliers, consultants, and professional advisors engaged by R&M.
- All employment agencies and labour providers supplying workers to R&M.
- All joint venture partners, development partners, and any other person or organisation acting on R&M's behalf or in association with R&M.

This policy applies to all R&M's operations, projects, and business activities, in all locations.

5. Risk Assessment - Construction Industry Context

R&M recognises that certain features of the construction industry create elevated modern slavery risks. R&M's risk assessment has identified the following principal risk areas:

- **Subcontracted and agency labour:** The extensive use of subcontracted labour and agency workers in construction creates layers between the end client and the individual worker, making it harder to monitor working conditions and easier for exploitative intermediaries to operate. Workers supplied through chains of subcontracting may be further removed from the protections of direct employment.
- **Migrant workers:** Migrant workers are disproportionately represented in the construction workforce and are particularly vulnerable to exploitation due to language barriers, unfamiliarity with UK employment rights, dependence on their employer for accommodation or immigration status, and social isolation.
- **Cash-in-hand and informal working:** While R&M operates entirely through formal, documented employment and subcontract arrangements, the wider construction industry includes significant informal and cash-in-hand working, which can mask exploitation.
- **Accommodation tied to employment:** Where workers' accommodation is provided or arranged by their employer or a labour provider, there is a risk of excessive deductions, substandard conditions, and workers feeling unable to leave because they would lose both their job and their home.
- **Remote or isolated sites:** Workers on remote construction sites may be isolated from support services and less visible to regulators and inspectors.
- **Materials supply chains:** Construction materials are sourced globally, and the extraction and manufacture of some materials (including timber, natural stone, steel, and bricks) have been associated with forced labour and child labour in certain countries and regions.

R&M reviews its modern slavery risk assessment annually and updates it to reflect changes in the business, the supply chain, or the external risk environment.

6. Due Diligence Processes

R&M undertakes due diligence on all new and existing supply chain partners to assess and manage modern slavery risk. Our due diligence processes include:

6.1 Supply Chain Onboarding

- All new subcontractors, suppliers, and labour providers are required to complete R&M's pre-qualification questionnaire, which includes specific questions on modern slavery, forced labour, right to work verification, and ethical employment practices.
- Subcontractors and suppliers must confirm that they have their own modern slavery policy or statement, or that they will comply with R&M's policy as a condition of engagement.
- Employment agencies must confirm that they are GLAA-licensed where required by law, that they conduct right to work checks for all supplied workers in accordance with the Home Office Code of Practice, and that they comply with the Employment Agencies Act 1973 and the Conduct Regulations.
- R&M assesses the modern slavery risk profile of each supply chain partner based on the nature of the work, the labour model (direct employment, agency, self-employed), the geographic origin of the workforce, and any previous concerns or intelligence.

6.2 Contractual Requirements

- R&M's standard subcontract and consultancy terms include clauses requiring compliance with the Modern Slavery Act 2015 and all applicable employment legislation.
- Subcontractors are required to pay their workforce at least the National Minimum Wage (and the National Living Wage where applicable), to provide written terms of employment, and to comply with the Working Time Regulations 1998.
- Subcontractors must not use any form of forced, bonded, or compulsory labour, must not confiscate or retain workers' identity documents, and must not make deductions from wages that are not authorised by law or by the worker's written consent.
- Subcontractors must flow down equivalent anti-slavery obligations to any further subcontractors in the supply chain.
- R&M reserves the right to terminate any subcontract or supply agreement immediately where there is evidence of modern slavery or serious labour exploitation.

6.3 Ongoing Monitoring

- R&M monitors working conditions on its projects through regular site visits, toolbox talks, welfare inspections, and engagement with the workforce.
- Site managers are trained to recognise the indicators of modern slavery and labour exploitation and to report any concerns immediately.
- R&M maintains an open-door culture where any worker - whether directly employed, agency-supplied, or working for a subcontractor - can raise concerns without fear of retaliation.
- R&M cooperates with GLAA inspections, local authority modern slavery teams, and any other relevant authority.

7. Right to Work Verification

Right to work verification is closely connected to modern slavery prevention. Workers without a legal right to work in the UK are among the most vulnerable to exploitation because they cannot access mainstream employment, have no recourse to public funds, and may be dependent on exploitative employers or intermediaries.

R&M's Right to Work Verification Policy requires that every individual working on an R&M project - whether directly employed, agency-supplied, or working for a subcontractor - has their right to work verified through original documentation at site induction. Where the right to work checking process reveals indicators of potential exploitation, the matter is escalated immediately to the Compliance Officer and, where appropriate, reported to the GLAA or the Modern Slavery Helpline.

Indicators that may be revealed during right to work checks include documents being held or presented by a third party rather than the worker, workers who appear not to understand the terms of their engagement or who they are working for, workers who appear to be under the control of another individual, documents that appear to have been fraudulently obtained or that do not match the worker's stated identity, and workers who appear fearful, withdrawn, or reluctant to speak.

8. Recognising the Signs of Modern Slavery

Modern slavery is often hidden. Victims may not recognise themselves as victims, may be afraid to speak out, or may have been coached to provide scripted responses. R&M trains its workforce to recognise the following indicators, which may suggest that a worker is being exploited:

8.1 Physical Indicators

- Signs of physical abuse, injury, or malnourishment.
- Workers who appear fearful, anxious, withdrawn, or reluctant to speak, particularly in the presence of a supervisor or third party.
- Workers who appear to be living in overcrowded, unsanitary, or substandard accommodation.
- Workers who wear the same clothes every day or who appear not to have access to personal belongings.

8.2 Behavioural and Situational Indicators

- Workers who are dropped off and collected from site by the same individual or vehicle, particularly if they appear to have no freedom to travel independently.
- Workers who have no access to their own identity documents, bank accounts, or mobile phones.
- Workers who cannot confirm their own address, the name of their employer, or their rate of pay.
- Workers who are never seen alone or who appear to be constantly supervised.
- Workers who are required to pay excessive charges for transport, accommodation, tools, or PPE that are deducted from their wages.
- Workers who are performing work that is beyond their competence or who do not appear to have received adequate training or induction.
- A sudden or unexplained change in the workforce, particularly the arrival of a group of workers from the same country or background who are provided by an unfamiliar subcontractor or agency.

8.3 Financial Indicators

- Workers whose wages are paid to a third party rather than directly to them.
- Workers who report that excessive deductions are being made from their pay for accommodation, transport, food, or other charges.
- Workers who appear to have no money despite being in employment.
- A subcontractor or agency whose labour rates appear unrealistically low, which may indicate that workers are not being paid the legal minimum.

9. Reporting Concerns

R&M encourages and requires all employees, workers, and supply chain partners to report any concerns about modern slavery or labour exploitation without delay. No one should attempt to investigate a suspected case of modern slavery themselves - the safety of the potential victim is the priority, and investigation should be carried out by the appropriate authorities.

Concerns can be reported through the following channels:

- **Site Manager:** Any concern observed on site should be reported to the site manager in the first instance, who will escalate to the Compliance Officer and, where appropriate, to the authorities.
- **Compliance Officer:** Phillip Hollingworth (Spectra Safety) - for any concern, whether observed on site or identified through due diligence, right to work checks, or other means.
- **Director:** Thom McKenna - for any concern, at any time, particularly where the reporting individual feels unable to raise the matter through other channels.
- **Modern Slavery Helpline:** 08000 121 700 (operated by Unseen, available 24 hours a day, 7 days a week). Reports can also be made online at www.modernslaveryhelpline.org. The helpline provides a confidential service for victims, members of the public, statutory agencies, and businesses.
- **Gangmasters and Labour Abuse Authority (GLAA):** 0800 432 0804 or intelligence@gla.gov.uk - for concerns about labour abuse, unlicensed gangmasters, or serious worker exploitation.
- **Police:** 999 in an emergency, or 101 for non-emergency reports. Modern slavery is a serious criminal offence and the police have specialist teams trained to investigate it.
- **CrimeStoppers:** 0800 555 111 - for anonymous reports.

R&M guarantees that no individual will suffer any detriment, disciplinary action, or adverse treatment as a result of raising a genuine concern about modern slavery in good faith. This protection applies to all employees, agency workers, and subcontractor operatives. Any retaliation against a person who reports a concern will be treated as a serious disciplinary matter. These protections are consistent with the Public Interest Disclosure Act 1998 and R&M's Whistleblowing Policy (RM-WBP-001).

10. Response to Identified Cases

Where a concern about modern slavery is reported or identified, R&M will take the following steps:

- The immediate safety and welfare of the potential victim is the first priority. R&M will take steps to ensure that the individual is removed from the exploitative situation and is safe, without alerting the suspected perpetrator where this could put the victim at further risk.
- The Compliance Officer and the Director are notified immediately.
- The matter is reported to the appropriate authority - the police, the GLAA, or the Modern Slavery Helpline - depending on the nature and severity of the concern. R&M does not attempt to conduct its own criminal investigation.
- The relevant Client Organisation and the Framework Manager are notified where the matter relates to a framework project, in accordance with R&M's transparency obligations.
- The subcontractor, agency, or other supply chain partner responsible for the exploitative arrangement is suspended pending investigation and, where the concern is substantiated, permanently removed from R&M's approved supplier list.
- R&M cooperates fully with any investigation by the police, the GLAA, or any other authority.
- A lessons-learned review is conducted to identify any failures in R&M's due diligence, monitoring, or reporting processes, and corrective actions are implemented.

11. Training and Awareness

R&M provides modern slavery awareness training to all employees as part of their induction, covering the definition of modern slavery, the legal framework, the indicators of exploitation, and the reporting procedures. This training is refreshed annually.

Enhanced training is provided to personnel in higher-risk roles, including:

- Site managers and project managers who oversee the workforce on a daily basis and are best placed to observe indicators of exploitation.
- Procurement and commercial personnel involved in subcontractor and supplier selection, agency engagement, and contract management.
- Personnel responsible for conducting right to work checks at site induction.
- Senior managers responsible for business development and client relationships, particularly in relation to public sector framework requirements.

Training is delivered through a combination of face-to-face sessions, toolbox talks, and online modules. R&M also participates in industry-wide initiatives to raise awareness of modern slavery in construction, including resources provided by the GLAA, the Chartered Institute of Building (CIOB), and the Supply Chain Sustainability School. Training records are maintained by Phillip Hollingworth and reported to the Director as part of the monthly KPI reporting cycle (see Section 14).

12. Materials and Global Supply Chain

R&M acknowledges that modern slavery risk extends beyond the labour supply chain into the materials and products used in construction. Certain materials have been identified as carrying elevated risk of forced labour or child labour in their extraction or manufacture, including natural stone (particularly from parts of Asia), timber (particularly from regions with weak governance and enforcement), steel, bricks, and certain minerals and metals used in building services and technology.

R&M manages this risk by:

- Requiring key material suppliers to confirm the origin and provenance of their products and to provide assurance that their supply chains are free from forced labour and child labour.
- Prioritising materials sourced from countries with robust labour protections and from suppliers who can demonstrate responsible sourcing practices.
- Specifying FSC or PEFC-certified timber on all projects to ensure that timber is sourced from sustainably and ethically managed forests.
- Engaging with the Supply Chain Sustainability School and other industry initiatives to improve transparency and traceability in construction materials supply chains.
- Monitoring reports and alerts from government and NGO sources (including the Home Office, the US Department of Labor, and the Global Slavery Index) regarding materials and countries associated with forced labour.

13. Voluntary Modern Slavery Statement

The Modern Slavery Act 2015 (Section 54) requires commercial organisations with a total annual turnover of thirty-six million pounds or more to prepare a slavery and human trafficking

statement for each financial year. Although R&M's turnover is currently below this threshold, R&M voluntarily publishes a Modern Slavery Statement setting out the steps it has taken to ensure that modern slavery is not occurring in its business or supply chains.

R&M's voluntary Modern Slavery Statement covers the company's structure, business, and supply chains, the policies in place in relation to slavery and human trafficking, the due diligence processes applied to the supply chain, the risk assessment methodology, the training provided to staff, and the key performance indicators used to measure effectiveness. The statement is approved and signed by the Director, published on the R&M website, and made available to Client Organisations and the Framework Manager upon request.

R&M adopts this voluntary transparency as a matter of principle and in recognition that public sector clients increasingly expect all suppliers - regardless of size - to demonstrate active engagement with modern slavery prevention rather than relying on the turnover threshold as a reason for inaction.

14. Monthly KPI Reporting Schedule

R&M measures the effectiveness of its anti-slavery programme through a structured twelve-month KPI reporting cycle. The Compliance Officer compiles monthly data which is reported to the Director and reviewed at the monthly management meeting. The annual cycle ensures that every aspect of the anti-slavery programme is monitored, measured, and improved on a continuous basis.

Month 1 (July) - Baseline and Policy Launch

- Confirm all current employees have received modern slavery awareness training (target: one hundred per cent).
- Confirm all active subcontracts and agency agreements contain modern slavery clauses (target: one hundred per cent).
- Publish updated Modern Slavery Statement on R&M website.

Month 2 (August) - Supply Chain Audit

- Percentage of approved supply chain partners who have completed the modern slavery pre-qualification assessment.
- Number of new subcontractors onboarded with modern slavery due diligence completed before first engagement.
- Identify any supply chain partners who have not yet returned their pre-qualification assessment and issue reminders.

Month 3 (September) - Right to Work Compliance

- Percentage of site inductions at which right to work documents were verified in accordance with the Right to Work Verification Policy (target: one hundred per cent).
- Number of follow-up right to work checks completed on time for workers with time-limited permission.
- Number of individuals refused site access due to inability to present valid right to work documents.

Month 4 (October) - Agency and Labour Provider Review

- Number of employment agencies on the approved supplier list and percentage holding current GLAA licence where required.
- Confirmation that all agencies have provided signed right to work compliance declarations.
- Review of agency labour rates against National Minimum Wage and National Living Wage benchmarks to identify any unrealistically low rates that may indicate exploitation.

Month 5 (November) - Site Welfare and Working Conditions

- Number of welfare inspections carried out across active projects.
- Number of concerns or indicators of exploitation identified during site walks, toolbox talks, or welfare checks.
- Confirmation that all site-based workers have access to welfare facilities that meet CDM 2015 requirements.

Month 6 (December) - Mid-Year Review and Reporting

- Mid-year summary of all modern slavery concerns reported, investigated, and outcomes.
- Number of supply chain partners removed or suspended due to modern slavery or labour exploitation concerns.
- Review of training completion rates - percentage of eligible personnel trained (target: one hundred per cent).
- Report to the Director summarising first-half performance against all KPIs.

Month 7 (January) - Risk Assessment Review

- Annual modern slavery risk assessment completed and documented.
- Identification of any new or emerging risks (new project locations, new supply chain partners, changes in labour market).
- Risk assessment findings communicated to site managers and procurement team.

Month 8 (February) - Training Refresh

- Annual modern slavery training refresh delivered to all employees.
- Enhanced training delivered to site managers, procurement personnel, and induction officers.
- Training completion rates recorded and any gaps addressed within twenty-eight days.

Month 9 (March) - Materials Supply Chain

- Review of key material suppliers' modern slavery and ethical sourcing declarations.
- Confirmation that FSC or PEFC-certified timber is specified on all active projects.
- Review of any government or NGO alerts regarding forced labour in construction materials supply chains.

Month 10 (April) - Subcontractor Compliance Audit

- Sample audit of subcontractor right to work records on active projects (minimum ten per cent of active subcontractors).
- Verification that subcontractors are flowing down modern slavery obligations to their own supply chains.
- Review of subcontractor payment practices to ensure workers are being paid at least the legal minimum.

Month 11 (May) - Framework and Client Reporting

- Prepare modern slavery compliance data for inclusion in framework KPI reporting to framework managers and Client Organisations.
- Respond to any Client Organisation information requests regarding modern slavery compliance.
- Review any lessons learned from framework audits or inspections during the year.

Month 12 (June) - Annual Review and Statement

- Full annual review of this policy - update to reflect any changes in legislation, guidance, risk profile, or business structure.
- Annual Modern Slavery Statement drafted, approved by the Director, and published.
- Year-end KPI summary compiled and reported to the Director, covering all twelve months.
- Targets set for the following twelve-month cycle based on performance and identified improvement areas.
- Policy review date confirmed for the next annual cycle.

In addition to the monthly reporting cycle, the following KPIs are tracked on an ongoing basis and reported immediately when they arise:

- Number of modern slavery concerns reported through any channel - reported to the Director and Compliance Officer within twenty-four hours.
- Number of workers refused site access due to right to work verification failure - recorded at each induction.
- Any supply chain partner identified as non-compliant with modern slavery obligations - escalated immediately.

15. Responsibilities

- **Thom McKenna (Director):** Overall accountability for anti-slavery compliance. Approves this policy and the annual Modern Slavery Statement, reviews monthly KPI reports, and ensures that anti-slavery considerations are integrated into business decision-making.
- **Phillip Hollingworth (H&S Adviser, Spectra Safety):** Responsible for implementing this policy, maintaining training records, monitoring compliance, advising on complex cases, and acting as the primary internal point of contact for modern slavery concerns.
- **Jon Scurr (Director of Operations):** Responsible for ensuring that site managers and project teams are trained to recognise and report indicators of exploitation, and that welfare standards on site meet the required standards.
- **Louis Howard (Procurement Manager, Enabl):** Responsible for ensuring that modern slavery due diligence is embedded in all supply chain procurement, that contractual provisions are in place, and that agency and subcontractor compliance is monitored.
- **Site Managers:** Responsible for day-to-day monitoring of working conditions on site, conducting welfare checks, and reporting any indicators of modern slavery or labour exploitation immediately to the Compliance Officer.

16. Related Policies and Documents

- Right to Work Verification Policy
- Financial Due Diligence and Subcontractor Selection Policy

- Anti-Bribery and Corruption Policy
- Prevention of the Facilitation of Tax Evasion (RM-PTE-001)
- Whistleblowing Policy (RM-WBP-001)
- Social Value Policy
- Environmental, Social and Governance (ESG) Policy
- Health and Safety Policy
- Modern Slavery Statement (published annually)

17. Policy Review

This policy is reviewed annually by the Compliance Officer and approved by the Director. The next scheduled review date is June 2027. The policy will also be reviewed following any modern slavery incident or investigation, any change in relevant legislation or guidance, any significant change in R&M's supply chain structure or labour model, or upon feedback from Client Organisations, the Framework Manager, or other stakeholders.

Signed and Approved:

Thomas McKenna

Director, R&M Property Group Ltd

Date: June 2026