

# MODERN SLAVERY POLICY

#### **MODERN SLAVERY PROCEDURE**

#### **POLICY AIM**

Rudolph & Hellmann Automotive Ltd (R&HA) remain committed to ensuring that we adhere to our legal and moral rights and obligations in providing an ethical logistic solution to all Stakeholders of the business.

#### INTRODUCTION

The process aims to ensure that everyone understands the processes relevant to their area of work. As endorsed by our Chief Executive Officer we note:

- Slavery and human trafficking remains a hidden blight on our global society. We all have a
  responsibility to be alert to the risks, however small, in our business and in the wider supply
  chain.
- Associates are expected to report concerns, and management are expected to act upon them.
- Modern slavery is a criminal offence under the Modern Slavery Act 2015. 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.
- This document sets out the policy of R&HA with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term 'modern slavery' has the meaning given in the Act.

### STAFF WHO NEED TO MAKE THEMSELVES AWARE OF THIS POLICY

Board Directors, shareholders and all R&HA personnel including permanent, agency and those with the same legally depicted employee statuses who work at Lichfield or on our contract sites.

## **PROCEDURE**

#### Our company

As the leading provider of 'on site' logistics services, R&HA specialise in removing inefficiency from manufacturing processes.

Born from the needs of a world-renowned vehicle manufacturer operating in the UK, our expertise ranges from the management of large time sensitive warehouses to direct production line feed and sub assembly.

Operating with discretion and integrity, several other UK manufacturers in the automotive sector have since benefited from our 'on site' logistics solutions.

File Name:	Modern Slavery						
Document Name:	RHA-OXF-GROUP-HR-020						
Responsibility:	ALL ASSOCIATES			Authorised by:	CEO		
Doc Issue Date:	02/05/2023	Revision Date:	N/A	Doc Version No:	1	Page No:	Page 1 of 3

## 2. Our supply chains

Our supply chain includes outsourced payroll, office stationery providers, IT vendors, recruitment consultants, uniform providers, MHE providers, external storage and consumables.

#### 3. Our policies on slavery and human trafficking

Our Anti-Slavery 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 chains.

## 4. <u>Due diligence process on slavery and human trafficking</u>

As part of our initiative to identify and mitigate risk:

- We currently work alongside with clients across various different sites in the UK.
   Additionally we operate our central support functions from a site based in Lichfield. Senior Managers including Board Directors are based and work from all sites, to ensure optimum control of the work environment.
- Where possible, we build long standing relationships with local suppliers and customers and make clear our expectations of business behaviour.
- With regards to national or international supply chains, our point of contact is preferably with a UK company or branch, and we expect these entities to have suitable anti-slavery and human trafficking policies and processes. We expect each entity to, at least, adopt 'one-up' due diligence on the next link in the chain. It is not practical for us (and every other participant in the chain) to have a direct relationship with all links in the chain.
- The Company's Whistleblowing Policy is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner. The Whistleblowing Policy applies to all employees and may be found on the Company's shared drive.

#### 5. Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain and contractors to comply with our values. The SMT and all managers are responsible for compliance in their respective departments and for their supplier relationships.

## 6. <u>Training</u>

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we provide training to relevant members of staff. All Directors have been briefed on the subject.

## 7. Our effectiveness in combatting slavery and human trafficking

We communicate with the next link in the supply chain and monitor their understanding of, and compliance with, our expectations to measure how effective we have been to ensure that slavery and human trafficking is not taking place in any part of our business or supply chains.

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This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our Group's slavery and human trafficking statement for the current financial year.

#### 8. Procedure Review

All policies, procedures and documentation implemented by R&HA have been produced based on statutory law and legal guidance or best practice. Their purpose is to ensure that everyone has a framework in place to assist in carrying out their roles to the best of their abilities and for the benefit of all stakeholders in the business. It remains your duty to familiarise yourself and adhere to any policy or procedure that relates to your employment. All staff are invited to comment on this policy and suggest ways in which it might be improved. Any suggestions should be sent to the HR Director who will liaise with the Group Board of Directors responsible for this document.

## 9. Supporting information

This policy and procedure supports the Company Handbook, individual terms and conditions of employment and other procedures including but not limited to those listed on the company Extranet.

#### 10. Former Procedure Updates

Version 1: Introduction.

**END OF DOCUMENT** 

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