



Group Ltd  
Kemp House  
160 City Road  
London  
EC1V 2NX

# Modern Slavery Policy V7



## 1. Definition of modern slavery

“Modern slavery” is a term which covers slavery (where ownership is exercised over a person); servitude (which involves the obligation to provide services imposed by coercion); forced or compulsory labour (which involves work or service exacted from any person under the menace of a penalty and for which the person has not offered himself voluntarily); and human trafficking (which concerns arranging or facilitating the travel of another with a view to exploiting them, even where the person consents to the travel).

We will ensure that we will comply with the Modern Slavery Act 2015 and are putting strict measures in place to ensure that modern slavery is not part of any of our business operations. This includes our supply chains, goods and services. This statement sets out the steps we are taking to continually develop our procedures and to check our compliance.

This statement covers our financial year ending October 2025.

## 2. Overview

An overview of our organisational structure, key business activities and supply chains is as follows:

- ✓ The sector(s) the business operates in and the nature of the activities
- ✓ Your business operating model (e.g. direct sales, through trusted partners, franchise etc)
- ✓ The organisation structure (top level) and group relationships (i.e. any associated companies, group structures etc)
- ✓ The make-up and complexity of the supply chains – where are your suppliers based? Which are the key value contracts? What are the key risk areas? Include an outline of the make-up and complexity of the supply chain, including the countries you source your goods or services from, including high risk countries where modern forms of slavery are prevalent; how you source and select suppliers (e.g. via tender/audits etc)
- ✓ Relationships with suppliers and others, including trade unions and other bodies representing workers.

We work closely with our main suppliers and customers; with our employees and their representatives ensure the highest level of compliance with ethical trading initiatives.

## 3. Responsibilities

- ✓ The R&V Group LTD general manager Doinita Mantu responsible for overseeing our efforts to help to eliminate modern slavery and for monitoring progress against the KPIs contained in this document.
- ✓ The Management team are responsible for ensuring that all recruitment and terms and conditions of employment comply with statutory requirements, and that any agencies used are appropriately checked and commit to ethical standards.
- ✓ Managers are responsible for upholding our “core values” and for ensuring that employees who work for them also behave in accordance with these.
- ✓ Our supply team is responsible for ensuring that appropriate checks are made prior to placing any orders with new suppliers, and that existing key suppliers are audited from time to time to ensure continued compliance.
- ✓ Our R&V Group LTD General manager Doinita Mantu works with our major customers to provide them with appropriate information on our modern slavery initiatives and to gain suggestions and feedback.
- ✓ Our cross-functional working party on Modern Slavery meets annually and includes representatives from HR, sales, purchasing and replenishment as well as trade union representatives and volunteer employee representatives.

#### 4. Documentation

We have the following policies in place for employees:

- ✓ Business ethics policy
- ✓ Corporate social responsibility policy
- ✓ Equal opportunity policy
- ✓ Recruitment and selection policy
- ✓ Whistleblowing policy

These are referenced in our company Handbook which is available on internal shared drive. All policies are updated on an annual basis, and we consult with managers and all employees prior to updating them.

Employees are reminded of the policies from time and time and notified of any updates.

#### 5. Risk assessments

We consider that the main areas of risk of modern slavery within our business and supply chain are as follows:

- human trafficking,
- slavery,
- servitude,
- forced labour,
- debt bondage,
- forced marriage,
- the worst forms of child labour.

#### 6. Actions we are taking

We have taken the following actions as part of our drive to eliminate modern slavery:

- Only work with registered recruitment businesses that you can be sure are legitimate;
- Ensure that you have a written contract with your chosen employment provider;
- Carry out spot checks on agency worker documents (eg right to work documents and contracts);
- Speak to workers to ensure they are being fairly treated.

#### 6.2 Employees

- ✓ We have a recruitment and selection policy to assist compliance with equal opportunity.
- ✓ All new employees are recruited directly, and we confirm to ethical standards. Right to work checks are conducted prior to joining, and we check with all new recruits that they have not been required to pay any fees to gain work with us, and inform them of the procedures that should be followed should they wish to leave our employment. In addition, we check that their passports have not been withheld and that they have not been required to sign any agreements with any third parties in respect of our offer of employment.

#### 6.3 Agency workers

- ✓ We only use agency workers sparingly, for temporary placements and holiday/sickness cover.
- ✓ We will ensure that any recruitment agencies we use have strict compliance to the Modern Slavery Act and require written confirmation from them that no agency worker is being exploited as part of any slavery or human trafficking. Recruitment agencies used will all be on our Preferred Supplier Listing.

#### **6.4 Suppliers of raw materials**

- ✓ All suppliers are issued with our Supplier's Ethical Code of Conduct which they commit to, and which sets out key minimum standards relating to employment and workers. This will be extended to cover modern slavery. Our supplier contracts will be updated to include clear provisions that require our suppliers to commit to taking clear steps to eliminate modern slavery, both within their own business and within their own supply chain (including with anyone with whom they sub-contract).
- ✓ Suppliers are required to self-certify their compliance with the code, but contractual provisions also include that we may undertake ad hoc site visits, audits and regular monitoring etc (or to end the contract early, and without penalty to us, in the event of a breach). Contractual penalties may be awarded against any supplier for a breach of contract, or for incorrect self-auditing responses, questionnaires or the giving of incorrect information.
- ✓ Major suppliers are requested to inform us of the steps that they are taking to eliminate modern slavery.

#### **6.5 Customers**

We also work closely with our major customers to ensure optimum environmental friendliness and to ensure that our practices and procedures are in line with national standards. This statement is brought to the attention of our customers in our offices and is also on free access in HR office.

#### **7. Due diligence, monitoring and auditing processes**

All suppliers are issued with our Code of Conduct and are required to sign and return a commitment to ensuring that they take appropriate steps to ensure that their businesses and supply chains are free from modern slavery. Prior to any orders being placed with them.

We audit our suppliers to ensure their production sites meet our hygiene, environmental and working standards. Major suppliers will be physically audited every year.

This audit will also extend to their employment practices and procedures to check whether slavery or human trafficking exists in their business.

#### **8. Penalties for breach**

If a supplier is found to be involved in any form of modern slavery, its contract will be terminated either immediately or on its due renewal date, depending on the severity of the breach and we may also report any suspicions of criminal activity to the police.

If the breach is a minor one, we commit to helping that supplier by providing guidance and support for the affected workers.

If it is established that any employee has acted in breach of any of our policies, or is aware of, has condoned or failed to report any suspicion of modern slavery within our business or supply chains, he/she will be subject to our disciplinary procedure.

#### **9. Training**

We will provide suitable training for all employees to ensure that they are aware of this Statement and can be vigilant in identifying and reporting any concerns they have.

Employees and managers are informed of any updates to our policies via email.

#### **10. Relevant performance indicators**

The following key performance indicators will be used to assess our progress in the year to towards eliminating modern slavery:

- ✓ all staff in sales and purchasing departments to be trained by in 2 months after their start date
- ✓ number of complaints raised through our grievance or whistleblowing procedures
- ✓ number of suppliers who are terminated due to allegations of modern slavery
- ✓ number of suppliers audited during the year
- ✓ number of suppliers passing their annual onsite audit



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Next review day 15<sup>th</sup> October 2025

Signed by:

R&V Group LTD

General Manager

Doinita Mantu

Date: 15<sup>th</sup> October 2024

Office held: R&V Group LTD shared drive HR folder

