



## **RedTitan Ltd Anti-Slavery and Human Trafficking Policy**

**V1.0 22/03/2022**

### **SECTION 1: Policy Statement**

**1.1** 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. 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 modern slavery is not taking place anywhere in our own business or our supply chains.

**1.2** We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our consultants, suppliers and business partners (together 'Suppliers'), and as part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children, and we expect our Suppliers to hold their own Suppliers to the same high standards.

**1.3** This policy applies to our Suppliers and all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, interns, agents, contractors, external consultants, third-party representatives and business partners.

**1.4** This policy does not form part of any employee's contract of employment and we may amend it at any time.

### **SECTION 2: Responsibility for the policy within RedTitan Ltd**

**2.1** At Board level for RedTitan Ltd, John Walder shall be responsible for overseeing and implementing the Policy.

**2.2** Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy.

### **SECTION 3: Compliance with the policy**

**3.1** You must ensure that you read, understand and comply with this policy.

**3.2** The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

**3.3** Employees of RedTitan Ltd must notify John Walder as soon as possible if they believe or suspect that a breach of this policy has occurred, or may occur in the future. Suppliers must notify a representative of RedTitan Ltd named in Section 2.1 of this Policy.

**3.4** You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.

**3.5** If you are unsure about whether a particular act, the treatment of workers more generally, or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with your manager or a director of RedTitan Ltd.

**3.6** We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no employee suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform your manager or a representative named in Section 2.1 of this policy immediately. If the matter is not remedied, and you are an employee, you should raise it formally to a director of RedTitan Trustees Limited.

### **SECTION 4: Communication and awareness of the policy**

**4.1** This Policy is available on the RedTitan Ltd website. Training will be provided as necessary.

**4.2** Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

### **SECTION 5: Breaches of this Policy**

**5.1** Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.

**5.2** We may terminate our relationship with other Suppliers, individuals and organisations working with us or on our behalf if they breach this policy.