

ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

POLICY STATEMENT

Modern slavery is a crime and violation of our fundamental human rights. It takes various forms, such as slavery, forced and compulsory labour, servitude and human trafficking, all of which have in common the depriving of a person's liberty by another in order to exploit him or her for personal or commercial gain. We have a zero-tolerance approach to modern slavery and are committed to acting ethically and with integrity in all our business dealings and relationships and to implement and enforce effective controls to ensure that modern slavery is not taking place in our own supply chains or business operations.

- 1 We are 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 contractors, suppliers and other business partners, 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 that our suppliers will hold their own suppliers to the same high standards.
- 2 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, subcontracted workers, volunteers, contractors, external consultants, third-party representatives and business partners, and agents.
- 3 This policy does not form part of an employee's contract of employment and Redwood may amend it at any time.

RESPONSIBILITY FOR THE POLICY

- 1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it.
- 2 The Managing Director has primary and day-to-day responsibility for implementing and monitoring this policy.
- 3 All managers are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern slavery in supply chains.
- 4 All staff and suppliers and customers are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the Managing Director.

COMPLIANCE

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

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 even suggest, a breach of this policy.

You must notify your line manager immediately if you believe or suspect that a conflict with this policy has occurred, or may occur in the future.

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

If you believe or suspect a breach of this policy has occurred or that it might occur you must notify your line manager immediately. You should note that we will give support and guidance to our suppliers to help them address any coercive, abusive and exploitative work practices in their own business and supply chains.

If you are unsure about whether a particular act, or treatment of workers, or their working conditions within any level of our supply chains constitutes any of the form of modern slavery, you must raise it with your line manager.

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 one 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 the HR department. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure, which can be found in the employment booklet or else contact the HR Department.

TRAINING

Training on this policy, and on the risk our business faces from modern slavery in its supply chains, forms part of the induction process for all individuals who work for us.

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.

BREACHES OF THIS POLICY

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

We may terminate our business relationship with any individuals and organisations working on our behalf if they breach this policy.

Dec 2019 rlb