

RVL Holdings plc, and associated and subsidiary companies.

## Modern Slavery Act Policy

### Introduction

This statement sets out our actions to understand all potential modern slavery risks related to our businesses and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in our own business and its supply chains. This statement relates to actions and activities during the financial year [1 April 2017 to 31 March 2018].

As part of the logistics sector we recognise that we have a responsibility to take a robust approach to slavery and human trafficking. We are absolutely committed to preventing slavery and human trafficking in all our activities, and to ensuring that our supply chains are, and remain, free from slavery and human trafficking.

### Organisational structure and supply chains

This statement covers the activities of RVL Holdings plc which include: property management and investment; self-storage; logistics; and waste management. Our supply chains are generally short and limited to large companies who supply large items of equipment and heavy goods vehicles. We have a supply chain for casual / temporary staff at some sites.

### Countries of operation and supply

Primarily we operate in the UK, however, our logistics arm reaches into Europe and beyond for the transportation of goods.

The following is the process by which the company assesses whether or not particular activities abroad or countries are high risk in relation to slavery or human trafficking:

- Consult the websites of the Foreign and Commonwealth Office, and the UK Trade and Investment Office for Overseas Business Risks at <https://www.gov.uk/government/collections/overseas-business-risk>
- Taking account of the government advice and considering the nature of the works to be undertaken, and the load to be transported a view is taken on the likelihood of human trafficking affecting the journey.
- For journeys considered to be high risk the driver(s) is advised of the risk and the controls to be taken to keep both the driver and the load safe. The driver is also supplied with details of local law enforcement services to contact if they suspect slavery or human trafficking is occurring.

### High-risk activities

The following activities are considered to be at high risk of slavery or human trafficking:

- Logistics journeys to Africa and the Middle East, as the government identifies these as high risk countries for Human Rights issues; Bribery and Corruption concerns; and Organised Crime.
- Using enclosed lorry trailers and transporting shipping containers as these are frequently targeted for human trafficking.

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### Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Policy:** company directors are responsible for developing this policy, publishing it, reviewing it annually and ensuring all relevant staff comply with the policy.
- **Risk assessments:** operational managers are expected to consider the implications for human rights and modern slavery whenever they assign work. If they perceive the risk to be high then a formal written assessment of the risk is produced and this must include actions to reduce the risk to the lowest level reasonably practicable.
- **Investigations/due diligence:** at any time that it is known or discovered that slavery and/or human trafficking has occurred a senior manager will be appointed to thoroughly investigate the circumstances. The senior manager will identify immediate causes, underlying causes and root causes for the occurrence, and identify what can reasonably be done by RVL Holdings plc and its associated and subsidiary companies.
- **Training:** managers and drivers will be briefed on an annual basis concerning slavery and human trafficking and their role in reporting and preventing it.

### Relevant policies

The organisation operates the following policy that describes its approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in its operations:

- **Whistleblowing policy:** The organisation encourages all its workers to report any concerns related to the direct activities, or the supply chains of, the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees who have concerns should follow the process described in the Employee Handbook.

### Due diligence

The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. We will take steps to improve substandard suppliers' practices, including providing advice to suppliers and requiring them to implement action plans.

RVL Holdings plc and associated and subsidiary companies will invoke sanctions against any supplier that fails to improve their performance in line with an action plan, up to and including the termination of the business relationship.

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### Performance indicators

RVL Holdings plc, and associated and subsidiary company's:

- require all managers with responsibility for any foreign logistics to have completed training on modern slavery by the end of 2018, and all new managers (with responsibility for any foreign logistics) to have completed training on modern slavery within one year of appointment.
- require all managers with responsibility for employing persons via an agency to have completed training on modern slavery by the end of 2018, and all new managers (with responsibility for employing persons via an agency) to have completed training on modern slavery within one year of appointment.
- require all Site Managers annually, to obtain from their suppliers, the suppliers statement on their position on modern slavery and human trafficking.

### Training

RVL Holdings plc requires all staff to complete a briefing session on modern slavery. This may be as part of a general induction process or as a stand-alone briefing.

The briefing on modern slavery and human trafficking must cover:

- business controls including:
  - not purchasing items at unrealistically low prices
  - not paying staff below the National Minimum Wage
  - not requiring products by unrealistic deadlines
  - obtaining suppliers statements on modern slavery and human trafficking
- how we assess modern slavery and human trafficking risks
- the signs of modern slavery and human trafficking
- what to do if modern slavery and human trafficking is suspected
- external help and guidance (Modern Slavery Helpline / Stronger Together initiative)
- what we will do if a supplier is suspected of involvement with modern slavery and human trafficking

### Awareness-raising programme

Periodically we will display posters at workplaces to help staff understand:

- the Modern Slavery Act
- how to identify and prevent modern slavery and human trafficking
- how to alert managers to a potential modern slavery and human trafficking issue
- external help and guidance that is available

### Chairman's approval

This policy has been approved by the Chairman of the Board of Directors.

Signature - *signed on original* - 27<sup>th</sup> March 2017