

MODERN SLAVERY AND CHILD LABOUR POLICY STATEMENT

This Policy Statement sets out RGIS commitments and minimum standards to prevent modern slavery, child labour, forced or compulsory labour, and human trafficking in our operations and supply chain. It is also intended to satisfy the transparency requirements of section 54 of the UK Modern Slavery Act 2015 for RGIS International Limited and relevant RGIS entities, where applicable.

INTRODUCTION

RGIS is committed to conducting its activities responsibly and to preventing modern slavery, human trafficking, forced labour and child labour in our operations and throughout our supply chain. This Policy Statement explains the standards we expect from our personnel and the third parties that work for or with RGIS.

This statement applies to all RGIS entities and to all workers (employees, agency workers, temporary staff and contractors). It also applies to suppliers, subcontractors, labour providers and other third parties that provide services to RGIS, operate on RGIS sites, or represent RGIS in dealings with clients or public authorities. Where local law sets higher requirements, RGIS will follow the higher standard.

This Policy should be read alongside RGIS's Code of Business Conduct and Ethics and any local HR, procurement and health & safety procedures that implement these requirements.

This statement is intended to satisfy modern slavery transparency expectations where they apply (including, where relevant, the UK Modern Slavery Act 2015) and to set a consistent baseline across jurisdictions. Local law may impose additional requirements; where local standards are higher than the minimums described here, the higher standard applies.

DEFINITIONS

- ▶ **Child labour:** work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical or mental development. It includes work performed by a person below the minimum legal working age, or below age 15 where no higher minimum applies, and the worst forms of child labour.
- ▶ **Forced labour:** work or service extracted from any person under the menace of a penalty and for which the person has not offered themselves voluntarily. This can include debt bondage, retention of identity documents, restriction of movement, intimidation, and withholding of wages.
- ▶ **Human trafficking:** the recruitment, transportation, transfer, harbouring or receipt of persons by means of threat, force, coercion, abduction, fraud, deception, abuse of power or vulnerability, for the purpose of exploitation. Indicators of forced labour may include deception, restriction of movement, retention of identity documents, withholding of wages, excessive recruitment fees leading to debt bondage, intimidation or threats, abusive working and living conditions, and excessive overtime beyond legal limits.
- ▶ **Modern slavery:** an umbrella term covering slavery, servitude, forced or compulsory labour and human trafficking. Recruitment fees means any fees or costs incurred in the recruitment process in order to obtain employment, regardless of whether paid in the worker's country of origin or destination; workers must not be charged such fees and should have a clear mechanism for reimbursement where they have been charged. Worst forms of child labour include, at minimum, slavery or practices similar to slavery, child trafficking, forced or compulsory labour, the use of children in prostitution or pornography, the use of children in illicit activities, and hazardous work likely to harm health, safety, or morals (as reflected in ILO standards).

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OUR BUSINESS

RGIS provides inventory and associated services across multiple jurisdictions. Our teams often work on client sites and may engage local subcontractors, labour providers and other business partners to support operations. This means that labour practices and working conditions can vary across locations and third-party arrangements, and requires consistent standards and oversight.

OUR COMMITMENT AND MINIMUM STANDARDS

RGIS has a zero-tolerance approach to modern slavery, human trafficking, forced labour and child labour. We will take reasonable and proportionate steps to identify and manage risks, and we will act promptly where concerns are identified.

RGIS will not knowingly engage in or benefit from any practice that involves the exploitation of workers. RGIS expects all personnel and third parties working for or on behalf of RGIS to:

- ▶ Comply with applicable labour and human rights laws, including minimum age, working time, wages and health & safety requirements;
- ▶ Ensure work is freely chosen and that workers can leave employment with reasonable notice;
- ▶ Prohibit retention of passports or identity documents and any restriction of movement as a condition of work;
- ▶ Prohibit threats, violence, harassment, intimidation or coercion;

Governance and responsibilities: The Group Compliance Officer and relevant regional management are responsible for implementing this statement, ensuring that appropriate procedures are in place, and supporting escalations. Procurement and operations teams must apply the minimum standards when selecting and managing suppliers, subcontractors, labour providers, and other third parties.

Risk assessment: RGIS considers modern slavery and child labour risks when entering new markets, onboarding new suppliers or labour providers, and structuring service delivery (including at client sites). Factors may include geography, industry sector, the use of agency labour, the presence of migrant workers, subcontracting chains, and any prior adverse information.

Recordkeeping: RGIS maintains appropriate records to evidence implementation of this statement, including supplier onboarding documentation, training completion, reports received, investigations undertaken, and remediation or corrective actions implemented. Records are retained for at least the period required by applicable law and internal retention rules.

- ▶ Ensure workers are paid at least the legal minimum wage and receive legally mandated benefits;
- ▶ Provide working conditions that are safe, hygienic and respectful; and
- ▶ Cooperate with RGIS due diligence, monitoring and remediation measures.

Where child labour is identified, RGIS expects immediate protective action for the child and a remediation plan that prioritizes the child's best interests, education and well-being, consistent with applicable law.

Working conditions: RGIS expects wages and benefits to meet at least legal minimums, working hours and rest to comply with local law, and all overtime to be voluntary and paid in accordance with law. Workers must have the freedom to leave the workplace after their shift and must not be subject to coercion or threats.

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Accommodation and transport: Where accommodation or transport is provided directly or indirectly, it must be safe and lawful, and any deductions must be transparent, lawful, and not used to create dependency or debt. Workers must not be forced to live in employer-controlled accommodation as a condition of employment.

Subcontracting and labour providers: Where agency labour or subcontractors are used, RGIS requires clear contractual obligations on age verification, prohibition of fees, lawful wages and hours, and cooperation with audits or inquiries. RGIS may require evidence of the labour provider's own due diligence and worker protections.

RECRUITMENT AND EMPLOYMENT PRACTICES

RGIS expects responsible recruitment and fair employment practices. Workers must receive clear information about the terms of their work (in a language they understand), including wages, hours, benefits, deductions and living arrangements where applicable.

Onboarding: Depending on the nature of the goods or services and the risk context, due diligence may include questionnaires, document requests, verification of policies and procedures, checks for adverse information, and confirmation of labour standards (including age verification and recruitment fee controls).

Contractual protections: Contracts may include representations and warranties on compliance with this statement and applicable law, audit/cooperation commitments, notification duties for suspected breaches, restrictions on subcontracting without consent, and termination or suspension rights for non-compliance.

Ongoing monitoring: RGIS may conduct periodic reviews, request updated information, and, where appropriate, carry out or commission audits. Where issues are identified, suppliers are expected to implement corrective action plans with defined timelines and to provide evidence of closure.

RGIS prohibits the charging of recruitment fees to workers. Where labour providers or recruiters are used, RGIS expects them to follow a 'no worker-paid fees' approach and to provide evidence of compliance when requested.

How reports are handled: Reports are assessed promptly and, where warranted, investigated proportionately. RGIS aims to protect confidentiality to the extent possible, to involve only those who need to know, and to comply with local legal requirements. RGIS may engage internal specialists or external advisors depending on the circumstances.

Remediation: Where modern slavery or child labour risks are identified, RGIS will seek to prevent further harm and to support appropriate remediation. This may include requiring a supplier to remove recruitment fees, return identity documents, regularise contracts, provide back pay, improve living conditions, or safely transition workers. Where child labour is found, remediation should prioritise the child's best interests and access to education, and avoid abrupt termination that could increase harm.

Escalation and authorities: If there is an immediate risk to a worker's safety or credible indicators of trafficking or severe exploitation, the matter must be escalated without delay to regional leadership and Compliance, and external authorities may be notified where appropriate and lawful.

Training is targeted based on role and risk exposure. Procurement, operations leaders, and those who manage third parties receive additional guidance on risk indicators, due diligence expectations, and escalation routes. Training completion is documented and refreshed periodically.

Identity documents must not be retained as a condition of work. If secure storage is offered at a worker's request, access must remain under the worker's control and the worker must be able to retrieve documents at any time. RGIS expects appropriate age verification and safeguards to prevent child labour. Where the minimum working age differs by jurisdiction, the higher age or stricter standard applies.

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RGIS monitors implementation using a mix of qualitative and quantitative indicators, which may include: the number of suppliers assessed for modern slavery risks; the percentage of relevant employees trained; the number of reports or concerns raised and resolved; audit activity and corrective action closure rates; and any confirmed incidents and remediation outcomes. This statement is reviewed at least annually and updated as needed to reflect changes in law, operations, and risk assessments.

RGIS expects working time, rest breaks and overtime to comply with applicable law. Any overtime must be voluntary and compensated in accordance with law. Where accommodation or transportation is provided, it must be safe, lawful, and not used to restrict freedom of movement or create dependency.

SUPPLY CHAIN AND THIRD-PARTY DUE DILIGENCE

RGIS conducts risk-based due diligence on third parties and supply chain partners. Due diligence may include assessing country and sector risk, understanding the third party's ownership and operating model, and evaluating labour practices and controls.

RGIS may require suppliers and labour providers to confirm compliance with this Policy and applicable laws, to provide supporting documentation, and to cooperate with audits or assessments. Where appropriate, RGIS will include contractual commitments covering modern slavery, child labour, forced labour and trafficking, and may include rights to terminate for material breaches.

Where risks are elevated, RGIS may apply enhanced measures, such as additional verification, site visits, worker interviews, corrective action plans and increased monitoring.

Third parties must ensure that any subcontractors they use meet the same standards and that responsibilities are not passed down without appropriate oversight.

REPORTING, REMEDIATION AND NON-RETALIATION

Anyone who suspects or observes modern slavery, forced labour, trafficking or child labour related to RGIS operations must report the concern promptly. Reports can be made to local management, HR, Legal/Compliance, or through the RGIS reporting channel: [Insert link / email / phone].

RGIS prohibits retaliation against anyone who raises a concern in good faith or participates in an investigation. Any retaliation may result in disciplinary action (subject to local law) and may lead to contractual remedies with third parties.

RGIS will assess reports and, where appropriate, investigate or support investigation in line with local procedures. RGIS may suspend engagement, require immediate corrective actions, or escalate to senior management. Where child labour or forced labour is identified, RGIS will prioritize immediate protection of affected individuals and work to implement remediation, including access to support services, wages owed, safe return, and education solutions for children where applicable.

TRAINING AND AWARENESS

RGIS provides awareness and training to relevant personnel, including those involved in hiring, procurement, supplier management and on-the-ground operations. Training focuses on identifying red flags, understanding reporting channels, and applying practical controls to prevent exploitation.

RGIS may communicate these expectations to suppliers and labour providers and require them to cascade appropriate training and controls within their own organisations.

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EFFECTIVENESS AND KPIS

RGIS monitors the effectiveness of this Policy through risk assessment and oversight processes. Where proportionate and appropriate, RGIS may track measures such as: the number of third parties screened; the number of high-risk suppliers subject to enhanced review; completion rates for relevant training; and the number and outcomes of reported concerns.

This Policy Statement is reviewed periodically and updated where needed to reflect changes in law, business operations and emerging risks.

APPROVAL

This Policy Statement is approved by RGIS' senior management and will be reviewed periodically and updated as necessary to reflect changes in law, business operations, and risk profile.

Approved on behalf of RGIS International Limited (and, where applicable, relevant RGIS entities):



ANNE SIMMONDS

Human Resources Director – Europe