

RWS Group

Modern Slavery and Human Trafficking Policy and Procedure

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Approver: Maria Schnell

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1 Document history

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Carla Matthews	10/02/2020	Document creation	0.1
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Maria Schnell	09/02/2023	Approved	5.0

2 Scope

This document details the approach RWS Holdings plc and its subsidiaries will take to provide guidance to all employees on the Policy and Procedure in relation to this practice and to comply with the Modern Slavery Act, 2015. As RWS has its head office in the UK, and is publicly listed on the Alternative Investment Market (AIM), the London Stock Exchange regulated market, the Group policies are UK law compliant.

3 Associated documents

- Speak Up Policy

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4 Introduction

- 4.1 The Modern Slavery Act 2015 (MSA) is aimed at combatting crimes of slavery and human trafficking. The MSA recognizes that businesses have a role to play in tackling these crimes.

5 Policy statement

- 5.1 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 and 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 in any of our supply chains.
- 5.2 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 MSA. We expect the same high standards from all of our contractors, suppliers and other business partners, and as part of our contracting processes we will 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 accountable to the same high standards.
- 5.3 This Policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, sub-contractors, third-party representatives and business partners.
- 5.4 This Policy does not form part of any employee's contract of employment and we may amend it at any time.

6 Responsibility for the Policy

- 6.1 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.
- 6.2 The Executive Team has the day-to-day responsibility for implementing this Policy, dealing with any queries about it, and overseeing systems and procedures to ensure they are effective in countering modern slavery.
- 6.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this Policy and are, where necessary, given adequate training.

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6.4 You 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 via your Executive Team Lead.

7 Compliance with this Policy

- 7.1 You must ensure that you read, understand and comply with this Policy.
- 7.2 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. You are required to avoid any activity which might lead to, or suggest, a breach of this Policy.
- 7.3 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of our business or supply chains of any supplier tier at the earliest possible stage.
- 7.4 If you believe or suspect a breach of this Policy has occurred or that it may occur, you must report it in accordance with our Speak Up Policy as soon as possible.
- 7.5 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 your Executive Team Lead.

8 Communication and awareness of this Policy

- 8.1 This policy is included in our Code of Conduct and all colleagues, and prospective future colleagues, receive training on this as part of our annual compliance and new colleague induction training programmes.
- 8.2 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.

9 Breaches of this Policy

- 9.1 Any employee who breaches this Policy will face disciplinary action, which could result in dismissal.
- 9.2 We may terminate our relationship with other individuals and organizations working on our behalf if they breach this Policy.

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10 Policy review

- 10.1 This Policy is available on the Group's intranet. If there are amendments to the applicable legislation or regulatory requirements, the Policy will be amended to reflect these. There will be an annual review by the person responsible for the Policy to ensure the document is fit for purpose and remains effective. Any changes will be communicated by email by way of the "Regulatory and compliance update", team briefings or training, depending on the complexity of the amendment.

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