

Integrated Management System	<b>Modern Slavery</b>		
	Reference:	RP/Hr/P/008	
Procedure	Version:	B1	
	Date:	10/12/2019	
	Authorised by:	Keith Williamson, Technical Director	

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## Record Of Change

Amendment Record				
Revision	Date	Author	Changes from Previous Revision	Purpose of Revision
A1	10/12/2019	Paul Taylor	None – First Draft	Draft for internal review
B1	18/12/2019	Paul Taylor	Minor Changes	Initial Issue

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## 1. Introduction

This document is a statement of RIDG’s Modern Slavery Procedure. The details are below. This Procedure is not part of your employment contract and it is not legally binding except where it is a statement of the law. You must be aware of this Procedure and procedure and apply it; accordingly, failure to do so may result in disciplinary action being taken against you. You should consult your manager if there is anything that is not clear to you or if you are unsure about any aspect of this Procedure.

## 2. Procedure Statement

Modern slavery is a criminal offence under the Modern Slavery Act 2015. Modern slavery can occur in various forms, including servitude, forced or 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. This document sets out RIDG’s Procedure with the aim of the prevention of opportunities for modern slavery to occur within its business or supply chain. This Procedure’s use of the term “modern slavery” has the meaning given in the Modern Slavery Act.

RIDG acknowledges its responsibilities with regard to ensuring that its operations do not involve any modern slavery and commits to complying with the requirements of the Modern Slavery Act 2015.

This Procedure applies to all persons who work RIDG directly or on our behalf in any capacity, including all employees at all levels, directors, officers, agency workers, seconded workers, volunteers, agents, work experience workers, contractors, external consultants, third party representatives and business partners.

RIDG has a zero-tolerance of modern slavery in any form. RIDG is committed to acting ethically and with integrity in all its business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its own business or its suppliers’ businesses.

RIDG is committed to ensuring there is transparency in its own business and in its approach to tackling modern slavery throughout its supply chains. RIDG expects that all of its contractors, suppliers and other business partners will uphold and apply the same high standards as RIDG applies. To this end RIDG will implement and maintain contracting processes to include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adults or children. It will require all suppliers to hold their own suppliers to the same high standards as those that we expect and require of our suppliers. RIDG will communicate this Procedure to all its suppliers and

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stakeholders at the commencement of any association with that supplier or stakeholder and ensure that all those associated with RIDG will not, under any circumstances, tolerate modern slavery in its own organisation or any organisation or individual with which it is associated. This Procedure and its contents will be re-communicated to those individuals and organisations from time to time thereafter.

Although RIDG takes steps to implement policies and practices to ensure that modern slavery is not taking place in its own operations, it recognises that it does not have control on those who run or work in its supply chain. However, to ensure RIDG’s compliance with this Procedure <and its statutory requirements and responsibilities> RIDG will implement the following actions:

- Undertake risk assessments to determine which parts of RIDG’s business is at risk of modern slavery and address those areas of the business as a matter of urgency.
- Undertake risk assessments to determine which suppliers’ businesses are at risk of modern slavery and positively engage with those suppliers that are identified to be at risk to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses and their supply chain and to ensure compliance with RIDG’s requirements;
- Introduce supplier pre-screening as part of RIDG’s buying and tender processes.
- Introduce contractual provisions for our suppliers to confirm their adherence to this Procedure, to accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.
- RIDG will terminate any supplier contract where RIDG suspects that the supplier is involved in modern slavery and fails to take the required actions to cease involvement in modern slavery within the required timeframe.
- Undertake training of RIDG’s employees in modern slavery.

### 3. Responsibility for This Procedure

RIDG’s Directors have ultimate responsibility for the prevention of modern slavery in RIDG and its supply chain and for ensuring that this Procedure and its implementation comply with its legal and ethical obligations.

Directors and managers at all levels in RIDG are responsible for ensuring those reporting to them:

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- understand and comply with this Procedure; and
- are given adequate and regular training on it and the issue of modern slavery.

Mike Hay is RIDG’s appointed Slavery Compliance Officer who has personal responsibility to the other Directors on a day to day basis for undertaking the required actions for the implementation of this Procedure and the person to whom all concerns should be formally addressed either internally or by anyone outside RIDG.

All employees are encouraged to raise any concerns they may have about suspected modern slavery associated with RIDG’s operations or those of our suppliers by immediately informing their line manager of their concerns.

RIDG encourages openness and will support anyone who raises genuine

concerns in good faith under this Procedure, even if those concerns ultimately turn out to be mistaken. RIDG is committed to ensuring no one suffers any detrimental treatment, such as dismissal, disciplinary action, threats or other unfavorable treatment, as a result of reporting in good faith their suspicion that modern slavery of whatever form is or could be taking place in any part of RIDG or in any of RIDG’s supply chains.

Any concern that an individual raises with RIDG about modern slavery will be taken seriously. It will be investigated and, where RIDG has a reasonable belief that modern slavery is taking place, addressed with urgency. The individual who raises the concern will be informed of the outcome of the investigation. Wherever possible, RIDG would prefer that the individual enables their name to be associated with such a concern reported to RIDG. However, an individual may express a concern anonymously, although this may render any investigation less effective.

If, as a result of an investigation, RIDG has a reasonable belief that an employee has been knowingly involved with or associated with modern slavery, the employee will be subject to RIDG’s Disciplinary Procedure which could ultimately lead to dismissal with or without notice.

Where a concern is raised regarding a supplier and RIDG has reasonable belief that modern slavery is taking place in that supplier, it will work with the supplier to prepare and ensure implementation of an action plan to resolve the matter within an agreed time frame. If the supplier fails to address the concern, implement an action plan, or meet an agreed time frame, RIDG reserves the right to terminate any relationship with that supplier.

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#### 4. Data Protection

To operate and administrate the Modern Slavery Procedure, RIDG needs to collect and process personal data. This personal data will be processed in accordance with RIDG’s Data Protection Procedure and Employee Privacy Notice. Where it is necessary for RIDG to collect and process information, which is called Special Categories of personal data, such personal data will be collected in accordance with RIDG’s Data Protection Procedure and Employee Privacy Notice related to the processing of special categories of personal data. RIDG has a legitimate and may have a legal interest in processing this personal data to ensure that the Modern Slavery Procedure is complied with and any process associated with it correctly managed.

All personal data collected and processed by RIDG is held securely and only accessed or disclosed to those individuals who require such information for the purposes for which it was collected. Any inappropriate access or disclosure of personal data is treated as a data breach. You should immediately report any such inappropriate access or disclosure to the person responsible for data protection as shown in, and in accordance with, RIDG’s Data Protection Procedure. Such a breach will be investigated and dealt with under RIDG’s Disciplinary Procedure and Procedure.

#### 5. Training

All personnel must be briefed on this procedure so that they are fully aware of the requirements of the procedure.

#### 6. Records

Records of review shall be kept for 3 years, then archived for a further 2 years.

#### 7. Review

This procedure will be reviewed annually or sooner in the event of changes within the organisation or its operational requirements.

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## 8. Audit

This procedure will be audited as part of the RIDG Integrated Management System audit program.