

# RedRay

## Modern Slavery and Human Trafficking Statement Financial Year 2023-2024

### 1. Introduction

RedRay provides Risk, Procurement, Commercial, Asset and Project management professional services to customers in the UK.

RedRay is a privately owned company providing its services from its headquarters in Potters Bar and at various client offices around the UK and internationally. Further information about RedRay's structure, functions and the markets within which we operate can be found at [www.redray.co.uk/](http://www.redray.co.uk/)

### 2. Purpose

The purpose of this statement is to outline RedRay's commitment to the elimination of modern slavery and human trafficking.

This statement is made pursuant to Section 54, Part 6 of the Modern Slavery Act and sets out the steps that RedRay has taken to ensure that slavery and human trafficking are not taking place within its supply chains or any part of its business. This statement covers the financial period from April 1<sup>st</sup> 2024 to March 31<sup>st</sup> 2025.

Modern slavery and human trafficking remain a hidden blight on our society. It is the responsibility of all to be alert to the risks, however small, in our business and the wider supply chain. RedRay is totally opposed to any such abuses within our direct operations, our indirect operations and our supply chain as a whole. We are proud of the steps we have already taken, and will continue to take, to ensure that slavery and human trafficking do not take place within any part of our business or our supply chains.

### 3. Our Policy

RedRay are committed to our business and supply chains being free of any practices of modern slavery and human trafficking. It is our expectation that our employees and our supply chain will respect this commitment and comply with relevant legislation. We are a business that upholds integrity and transparency in all our business dealings and our modern slavery prevention measures are no exception. Our policy and processes and any changes to them are communicated to those affected. We are committed to investigating any complaints about suspected human trafficking activity in relation to our business and will take prompt remedial action, where necessary.

## **4. Our Supply Chains**

Our supply chains include:

- Professional services
- ICT hardware
- Office equipment and furniture
- PPE
- Stationery, books, publications, periodicals
- Vehicles

We internally review our supply chain to evaluate human trafficking and slavery risks. We conduct supplier audits which review all aspects of the supply chain including safety, human trafficking, child labour and other legal requirements.

It is our expectation that our suppliers:

- Comply with the provisions of the Modern Slavery Act;
- Adhere to our commitment to a zero tolerance approach when it comes to any form of slavery or human trafficking;
- Take steps to prevent modern slavery within their business and supply chains;
- Pay the national living wage for UK-based employees; and
- For non-UK based locations, the wages of their employees meet applicable local standards.

RedRay record the suppliers we engage. In addition, a list of potential suppliers, who can support our service delivery, if required by our clients, is available on a supplier database maintained by our operational team. These suppliers are required to submit information covering a wide range of topics relevant to management systems, internal policies, diversity and the like. Our direct employment model means that we are largely able to conduct our own checks and that any areas of concern in the supply chain can be identified and audited.

## **5. Our Policies in relation to Slavery and Human Trafficking**

RedRay are committed to ensuring that there is no modern slavery or human trafficking within our supply chains or in any part of our business. In keeping with our commitment to act ethically and with integrity in all our business dealings, the following have been reviewed to ensure that there is no slavery or human trafficking in any part of our business or our supply chains:

- Standard and conduct of behaviour
- Whistleblowing policy
- Safeguarding policy
- Supplier code of conduct
- Sustainable procurement policy
- Standard terms and conditions of purchase

## **6. Risk Assessment and Due Diligence**

The risk of slavery and human trafficking within RedRay is substantially avoided due to our policies and procedures. As part of our initiative to identify and mitigate risk, we attempt to build long standing relationships with our suppliers and customers. We ask our supplier to ensure that they have adequate procedures in place to identify and prevent modern slavery and human trafficking within their own supply chains, and to notify us immediately of any actual or suspected slavery or human trafficking.

We regularly conduct audits of our suppliers to monitor compliance with our expectations and legal requirements. Audits are carried out internally and if any issues are identified during our audit, the supplier is required to prepare a corrective action plan and resolve everything identified within an agreed time period.

We have a system to encourage the reporting of concerns and the protection of whistle blowers.

## **7. Supplier Adherence**

We have zero tolerance to slavery and human trafficking within our supply chains and we expect all those within our supply chains, including contractors, to comply with our values.

## **8. Training and Awareness**

To ensure high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business we provide guidance and training to our staff.

More generally, we actively support employee engagement, representation, dialogue and the ability of an employee to raise potential concerns or grievances.

## **9. Effectiveness and Review**

Any instance of slavery or human trafficking will be picked up as part of our internal auditing programme. RedRay will continue to review and monitor our effectiveness through our auditing programme and in line with our policies and procedures and will adapt our procedures or introduce performance indicators should this prove necessary.

This statement is made pursuant to Section 54, Part 6, of the Modern Slavery Act 2015 and constitutes RedRay's Slavery and Human Trafficking statement for financial year ending to March 31<sup>st</sup> 2025.

Signed:



Chairman RedRay Limited  
April 2024