



# Modern Slavery Act Transparency Statement 2023/2024

Robertson Group Holdings Limited

## Statement

The Robertson Group Holdings Limited are committed to playing our role in eradicating Modern Slavery in all its forms from our business and supply chain. We are taking the appropriate steps to ensure that everyone who works for Robertson benefits from a working environment in which their fundamental human rights are respected and anyone that we do business with also upholds these principles.

The information in this statement details the policies, processes and actions we have taken to ensure that slavery and human trafficking are not taking place in our supply chains or any part of our own business. It covers the activities of all subsidiary businesses within Robertson Group Holdings Limited and is our Modern Slavery statement for 2023/2024 reflecting on the financial year 2022/ 2023 as required under the provisions of the Modern Slavery Act 2015 (the "Act").

## Our purpose

Robertson Group Holdings Limited is committed to being a purpose-led organisation that exists to 'assure a sustainable future' for all our stakeholders, it's what makes us stand out from the crowd. Our purpose guides our daily decision-making and provides certainty and assurance for:

- our customers, the certainty that we will deliver what we say we will;
- our people, the certainty of opportunity and progress, and knowing that their safety is paramount;
- the communities we operate in, the certainty that we will consult openly and work to build a positive and lasting legacy.
- our suppliers and partners – by treating them fairly and encouraging them to deliver; and
- society – by acting as a responsible business for our communities.

## Our principles

The Robertson Group Holdings Limited strives to create better outcomes for all our stakeholders by living our principles:

- We listen
- We are professional
- We take responsibility
- We are determined to succeed
- We are one team

We bring these principles to life through our day-to-day behaviours and by aspiring to put our purpose at the centre of everything we do. To ensure our employees are aware of the Act and the drivers of Modern Slavery, as well as the possible risks, we share this statement with all employees through our internal communication channels and a copy of this statement is available on our website [www.robertson.co.uk](http://www.robertson.co.uk). We have provided training about our due diligence processes to relevant procurement teams, making them aware of the Act and the role they play in ensuring we work with our supply chain to ensure they uphold the same ethical principles as us.

## Our supply chain

Robertson Group Holdings Limited currently operate with a supply chain of circa 2000 members who are committed to meeting both legal and ethical standards in their daily operations, while ensuring that compliance is managed appropriately across their own supply chain partners.

As a minimum, we expect both ourselves and our supply chain to comply with all applicable local laws and regulations providing safe working conditions, treating workers with dignity and respect, acting fairly and ethically and using environmentally responsible practices where practicable.

Our Supply Chain Code of Conduct sets out these requirements detailing the basic principles of how we will conduct business in an open, honest and transparent manner, and the behaviours and practices we expect of our supply chain, including a commitment to comply with the Act.

Our standard terms and conditions include a clause to ensure that all of our supply chain comply with our Responsible Procurement Policy. Robertson reserves the right to terminate a relationship with a supplier or third party that is unable to demonstrate compliance or progress towards the eradication of Modern Slavery within its organisation and supply chain.

## Supply chain compliance with our Responsible Procurement Policy

We recognise our statutory obligation to set out the steps we have and will continue to take as a responsible business to ensure that no acts of Modern Slavery or human trafficking are evident in our supply chain. However, we also acknowledge that we do not control the conduct of individuals and organisations within our supply chain.

Compliance of our supply chain with our Responsible Procurement Policy will be monitored via our Procurement process through which we will maintain and monitor supply chain risk exposure including Modern Slavery.

## Due diligence

Robertson Group Holdings Limited conducts due diligence on all of its supply chain. This due diligence includes the encouragement of subcontractors to be members of third-party approval schemes with 100% compliance across our top 1300 members. In addition, as part of our contract with any supply chain member, we require that our supply chain confirms to us that:

1. they have taken steps to eradicate Modern Slavery within their business.
2. they hold their own supply chain to account over Modern Slavery.
3. they pay their employees at least the national minimum wage / national living wage (as appropriate); and
4. provide an annual update confirming business compliance to key measures identified in this policy.

Robertson Group Holdings Limited will report to the police, take appropriate action to protect the victims of Modern Slavery and Trafficking and ultimately shall enforce its contractual rights should any instances of Modern Slavery come to light. We are fully committed to making sure that no business practices – either internally or through our external supply chain – would contravene Section 54 and/or Clause 5 of the Act, are tolerated.

Additionally, to demonstrate compliance to the Responsible Procurement Policy, new and renewing suppliers are asked a series of due diligence questions. The subjects covered are human trafficking and slavery, health and safety, the environment, data protection, information security and bribery.

## Risk management

Robertson Group Holdings Limited is committed to continually reviewing and updating our approach to identifying and managing risk associated with our supply chain. We have committed to undertaking the following steps to:

- proactively develop learning pathways for both employees and supply chain partners to create further awareness throughout the business to ensure that we all drive awareness and understanding of the effects of Modern Slavery.
- develop on-site controls through implementation of enhanced processes and procedures that support the ability to identify specific risks associated with Modern Slavery whilst providing a platform to support future improvements.
- continue to enhance our programme of engagement with our supply chain, which identifies areas of high risk, to increase our influence on activities throughout their full value chain.
- utilise external resources to support both awareness of risk and development of controls to address this issue across all areas of our internal business and extended supply chain.
- further develop our suite of policies to address Human Rights across our supply chain.
- ensure that minimum standards identified through our Supply Chain Code of Conduct are shared across all supply chain members; and
- enhance our onboard induction process to further highlight the responsibility of all staff and employees in working to identify signs of Modern Slavery and report these through the appropriate channels.

To support our commitment, we have during 2022 and 2023 developed and implemented the following risk mitigation measures:

- Internally promote our commitment to continue to work with Industry peers under the stewardship of the Gangmasters Labour Abuse Authority (GLAA);
- Mandate the completion of our annual desk top review for compliance with Modern Slavery requirements for all existing and new sub-contractors across our family of businesses.
- Develop and roll out a companywide Modern Slavery Policy.
- Enforce the use of approved Agency labour providers who have been appropriately vetted and comply with Robertson minimum standards at all times.
- Developing a supply chain partnership programme to develop key open communication and development platforms to support wider supply chain governance throughout all stages of the value chain.
- continued to reinforce our drive to improve both awareness and compliance across all areas of the supply chain through the introduction of a group-wide supply chain webinars, supporting third party supply chain awareness events and a compliance survey.
- Mandating supply chain membership with the Supply Chain Sustainability School to provide greater guidance and support to all Subcontractor members of the supply chain; and
- further reviewing and enhancing our electronic onboarding system mi Pre-enrolment for all Robertson and extended supply chain operatives to ensure that all workers have a right to work in the UK.

We will record the effectiveness of the steps that we are taking to ensure that slavery and/or human trafficking is not taking place within our business or supply chain. We will do this through the measurement and escalation of any reports received from employees, our customers, the public, or law enforcement agencies to indicate that Modern Slavery practices have been identified.

## Training

As partners of the Supply Chain Sustainability School, we continue to utilise industry wide training resources for both our own employees and those of our supply chain. We actively promote engagement in events and briefing sessions which are held by the school along with promoting associated e-learning modules and working to develop Learning pathways to ensure that awareness is maintained across all parties.

## Relevant policies

Robertson Group Holdings Limited has in place policies and associated procedures to ensure that we are conducting our business in an ethical and transparent manner. These include:

- Modern Slavery Policy and Statement.
- Recruitment policy.
- Whistleblowing policy.
- Responsible procurement policy; and
- Equal opportunity policy.

Any breach of Robertson Group Holdings Limited policy will be regarded as a serious matter and will result in appropriate action being taken.

## Board approval

This statement is made pursuant to Section 54(1) of the Act. The Robertson Group Holdings Limited Board approved this statement on the 30<sup>th</sup> September 2023. The statement will be reviewed and updated in September 2024.

Elliot Robertson

Chief Executive Officer

Robertson Group Holdings Limited