



# Modern Slavery Statement Financial Year 2019/2020



## BACKGROUND

This statement is made pursuant to s.5 (1) of the Modern Slavery Act 2015 and sets out the steps that Rydon Group Limited has taken and is continuing to take to ensure that modern slavery or human trafficking is not taking place within our business or supply chain. Modern slavery encompasses slavery, servitude, human trafficking and forced labour.

Rydon Group Limited has a zero tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

## OUR BUSINESS

Rydon Group Limited is a construction, development, maintenance and management group operating throughout England. We are a multi-talented organisation, working across a wide range of market sectors within the built environment. We bring together an immense wealth of experience, expertise and talent, united by common values and principles, focused on partnering with our clients to enhance the quality of living for the communities in which we work.

## Definitions

Rydon considers that modern slavery encompasses:

- human trafficking
- forced work, through mental or physical threat
- being owned or controlled by an employer through mental or physical abuse or the threat of abuse
- being dehumanised, treated as a commodity or being bought or sold as property
- being physically constrained or to have restriction placed on freedom of movement.

## Commitment

Rydon acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015.

Rydon understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

Rydon does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Company in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. Rydon strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the United Kingdom.

## Our Policies

We operate a number of internal policies to ensure that we are conducting business in an ethical and transparent manner. These include:

- Anti-Bribery Policy
- Conflict of Interest Policy
- Corporate Social Responsibility Policy
- Environmental & Sustainable Development Policy
- Health & Safety Policy
- Modern Slavery Policy
- Recruitment, Selection & Induction Policy
- Safeguarding Policy
- Whistleblowing Policy

## Our High Risk Areas

Rydon considers its main exposure to the risk of slavery and human trafficking to exist within our sub-contractors workforce. As with other businesses working in the built environment, the majority of the workforce employed on our construction sites and the materials supply chain are sub-contracted labour and therefore we work closely with them to enable them to understand their legal obligations.

## Our Sub-Contractors

Rydon operates an approved subcontractor list. We conduct due diligence through pre-qualification questionnaires/interview prior to allowing them to become approved subcontractors. Part of this approval includes

sub-contractors confirming that no part of their business operations contradicts our Modern Slavery Act Policy.

## Due Diligence

Rydon carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

Rydon has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the organisation has taken the following steps to ensure that modern slavery is not taking place:

- Employee induction making our employees aware of the Modern Slavery Act, including the definitions of slavery and human trafficking;
- Advising staff what to do if they suspect a case of slavery or human trafficking;
- Reviewed our Whistleblowing Policy and launched 'Speak Up', a confidential hotline for staff and stakeholders to confidentially report any instances of potential unethical behaviour, including modern slavery.

## SLAVERY COMPLIANCE OFFICER

Rydon has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to Rydon's obligations. This officer is Lisa Fitzsimons.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year

## GOVERNANCE

Rydon will commit to fulfilling its legal obligations as set out by all current legislation relating to employment disputes. This will include, but will not be limited to, the following:

- The Equality Act (2010)
- The Human Rights Act 1998
- General Data Protection Regulations (2016)

Company policies are communicated and made available via the Rydon Intranet and are referenced in a number of internal training programmes.

Company policy is approved by the Group Board which is chaired by the Chief Executive. Each policy is reviewed at least annually to ensure that we respond to clients, business strategy, legislation and any standards or codes of practice

determined by the market.

This policy must be strictly adhered to by every employee. Any breaches of this policy will be investigated and, where appropriate, disciplinary procedures will be applied.

Oversight of the Modern Slavery Policy is the responsibility of the Director of Human Resources.

**Signed:** **Lisa Fitzsimons**  
*Group HR Director*

**Dated:** **September 2020**