



## Modern Day Slavery Statement

### Introduction

RTC Europe Ltd recognises that we have a responsibility to take a robust approach to slavery and human trafficking. This statement sets out RTC Europe Ltd's actions to understand all potential modern slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

This statement relates to actions and activities during the financial year 1 January 2023 to 31 December 2023.

### Who We Are

RTC are an independent retail marketing services company work with major Global Brands and Retailers to improve the shopping experience and grow the bottom line.

RTC Europe Ltd is a subsidiary of RTC Industries inc headquartered in Chicago, Illinois with a registered European Head Office in UK comprising of Warehousing and Manufacturing, with a Design Office in Lutterworth, Leicestershire, Sales offices in Paris and Hamburg and a Fitout and Installation office in Prague, Czech Republic.

RTC is a global company with 900 associates working out of 28 offices based in 13 countries. First established in Chicago in 1950, RTC's European Head Office opened in 1987. We have had the privilege of partnering with many of the world's leading brands and retailers for the last 36 years.

### Slavery and Human Trafficking

#### Relevant policies

This statement confirms that RTC Europe Ltd is committed to ensuring that there is no modern slavery or human trafficking in any part of its business or supply chain. The following policies describe our approach to the identification of modern slavery risks and steps taken to prevent slavery and human trafficking in our operations:

- **Modern Slavery Policy** which sets out the key issues and how we respond to them including the internal process for reporting any concerns.
- **Whistleblowing policy** We encourage all our workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of, our organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. Our whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can use our anonymous, confidential helpline.
- **Employee code of conduct** Our code of conduct makes clear to employees the actions and behaviour expected of them when representing our organisation. We strive to



maintain the highest standards of employee conduct and ethical behaviour in all our business relationships.

- **Supplier code of conduct** We are committed to ensuring that our suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. We work with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. However, serious violations of our supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment Policy** We use only specified, reputable employment agencies to source labour and always verify the practices of any new agency, before accepting workers or candidates for interview, from that agency.
- **Labour and Human Rights Policy** reinforces our commitment to ensuring that there is no human slavery or child labour within our business operations and confirms that all our associates are free to leave their place of work.
- **Employing Overseas Workers Policy** that details the steps taken during the recruitment process to verify eligibility to work in the UK and to ensure that workers are recruited from reputable agencies.
- **Ethics Policy** details our confidential ethics hotline that allows for anonymous reporting of any issues.

## **RTC's Supply Chain**

Our global procurement team maintains a database of preferred suppliers across a broad range of materials, disciplines and locations. Within that list, we have key suppliers in each global region that we partner with. Our procurement team works with our quality, compliance and project management teams to manage supply chains across the world. This means that we not only work with suppliers who are based in different regions, but also that we leverage the knowledge and experience of our international associates. Our Sourcing Managers work on monitoring the costs of raw materials and freight, to understand their fluctuations in the current market, as well as the identification of potential new suppliers.

We are able to source any number of different materials for production. Production may be located at an RTC in-house facility or with a carefully chosen third-party vendor. The materials we are able to source include: electrical components, electro plating, metalwork, plastic and acrylic, powder coating, wet painting, joinery, veneers, upholstery, printing, assembly and packaging, electronics and digital solutions. We are able to produce FSDUs, Shop-In-Shop, Full Brand store furniture as well as providing assembly and installation services.

## **Due Diligence Processes for Slavery and Human Trafficking**

RTC undertakes due diligence when onboarding new suppliers, and regularly carries out reviews of its existing suppliers. Our due diligence and reviews include:

- mapping the supply chain to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluating the modern slavery and human trafficking risks of new suppliers:



- conducting supplier audits or assessments through the organisation's own staff, which have a greater degree of focus on slavery and human trafficking where general risks are identified;
- taking steps to improve substandard suppliers' practices, including providing advice and mentoring to suppliers, and requiring them to implement action plans;
- using SEDEX, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationship.

Our Senior Leadership Team has overall responsibility for compliance with the Act, and review progress annually.

### **Combating Slavery and Human Trafficking in 2024**

For the forthcoming financial year, we plan to further reinforce our due diligence processes. In particular we will:

- Continue to undertake ethical audits of our supply chain, utilizing SEDEX and / or Ecovadis where possible.
- Continue to work to improve our ethics and sustainable procurement procedures and in turn our Ecovadis rating.
- Deliver mandatory e-learning training modules to all associates throughout our European offices to ensure a working knowledge and understanding of modern slavery and the risks of it within our business.
- For those associates involved in key areas where modern slavery and human trafficking is more high risk, such as HR and Procurement, provide further, more in depth online training that is relevant to their job role.
- Revise the onboarding program to include mandatory e-learning modules on modern slavery and human trafficking.
- Continue to promote our anonymous, confidential helpline and code of conduct, raising awareness of modern slavery and the process for reporting should associates have concerns that modern slavery is taking place.
- Share this statement on our website and intranet to further raise awareness of modern slavery and human trafficking.

### **Key Performance Indicators To Measure Effectiveness**

We log any complaints received either via our ethics hotline or via internal processes, together with any remedial actions taken. To the date of this statement, we have not received any reports of modern slavery.



This statement was approved on 6<sup>th</sup> May 2024 by our Senior Management Team, who review and update it annually in line with The Modern Slavery Act.

A handwritten signature in black ink, appearing to read 'Paul Higgins', written over a horizontal line.

**Paul Higgins**  
**Group Managing Director**  
**RTC Europe Ltd**