

Modern Slavery Policy

Section Twenty Four

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.

Ramco is aware of the Government's initiative aimed at tackling Modern Slavery and that under Section 54 of the Modern Slavery Act companies with an annual turnover of £36m or more are required to publish a Modern Slavery Act statement at the end of each financial year covering both their own business and that of its supply chain members. Although Ramco's turnover is currently below this threshold, the issue itself was considered at Senior Management level. It was concluded that the likelihood was remote if non-existent given the nature of the company's operations however this document sets out Ramco's policy with the aim of the prevention of opportunities for Modern Slavery to occur within its business or supply chain.

Ramco has a zero-tolerance approach to Modern Slavery. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure Modern Slavery is not taking place anywhere in our own businesses or those of our suppliers.

We are committed to ensuring there is transparency in our own business and in our approach to tackling Modern Slavery throughout our supply chains. We expect the same high standards from all of our subcontractors, suppliers and other key stakeholders, and we are evolving and updating our 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.

Whilst recognising our statutory obligation to set out the steps we have taken to ensure that Modern Slavery and Human Trafficking is not taking place in our supply chains, we acknowledge that we do not control the conduct of individuals and organisations in our supply chains. To underpin our compliance with practical steps, we intend to implement the following measures:

- Engage with our suppliers and subcontractors both to convey to them our Anti-Slavery and Human Trafficking Policy and to gain an understanding of the measures taken by them to ensure Modern Slavery is not occurring in their businesses and their supply chain
- Conduct risk assessments to determine which parts of our business and which of our suppliers and subcontractors are most at risk of Modern Slavery so that efforts can be focused on those areas

Responsibilities

Ultimate responsibility for the prevention of Modern Slavery rests with the company's leadership. The Senior Management Team has overall responsibility for ensuring this policy and its implementation comply with our legal and ethical obligations. The policy will be reviewed by the Board on a regular basis and may be amended from time to time. Managers at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of Modern Slavery.

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Member of staff are encouraged to raise any concerns about suspected Modern Slavery associated with the company or our subcontractors and should do this through their manager. We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that Modern Slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. The company will accept and take seriously concerns communicated anonymously. However, retention of anonymity does render investigations and validation more difficult and can make the process less effective. Individuals are therefore encouraged to put their names to allegations.

If an issue is identified with a subcontractor we will work with them to prepare a corrective action plan and resolve all violations within an agreed upon time period. Our zero-tolerance approach to Modern Slavery will be communicated to all subcontractors and key stakeholders at the outset of our business relationship with them and reinforced as appropriate thereafter.