



HRP01

Anti-Slavery and Human Trafficking Policy

In accordance with the Modern Slavery Act 2015

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Circulation List

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Amendment History

This policy is reviewed periodically, at least annually, and is retained for a period of three (3) years. Amendments and revisions are distributed to the named holders. The history of amendments and the issue of revisions are recorded below.

Date	Amend. No.	Page No.	New Issue No.	Reason for Change	Authorised By
01/06/2019	-	All	1	Initial release	Dmitry Samarin
01/06/2020	1	All	2	Annual review	Dmitry Samarin
01/06/2021	2	All	3	Annual review	Tony O'Sullivan
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05/09/2024	5	All	6	Corporate changes	Tony O'Sullivan
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1. Introduction

As a company, RETN Capital maintains relationships with many different organisations in its supply chain, as well as supplying varying levels of contract, interim, temporary and permanent workers. In the light of the general law on employment and human rights, and, more specifically, the Modern Slavery Act 2015, we have reviewed our existing compliance and risk management processes to determine what existing measures are undertaken and what further measures may be required to prevent slavery and human trafficking taking place in any part of our businesses or supply chain.

RETN Capital has adopted a statement of our corporate values on the prevention of modern slavery and human trafficking. This value statement governs all our business dealings and the conduct of all persons or organisations with whom we contract directly or who we appoint to act on our behalf.

We expect all or who have, or seek to have, a business relationship with RETN Capital and/or any member of our company, to familiarise themselves with, and act at all times in a way which is consistent with our anti-slavery values.

2. Core Values

As part of our culture of good governance for good business, at RETN Capital we operate to a set of core values which reflect our relationships with our customers, shareholders, suppliers, and team members. We adopt a behavioural value for all our business relationships, reflecting our attitude to the exploitation of individuals in any form, and more particularly the offences under the Modern Slavery Act 2015. We are committed to opposing modern slavery in all its forms and preventing it by whatever means we can. We demand the same attitude of all who work for us and expect it of all with whom we have business dealings.

3. Purpose

Modern slavery is a criminal offence under the Modern Slavery Act 2015 (the "Act"). Modern slavery can occur in various forms, including servitude, forced or compulsory labour and human trafficking, all of which deprive an individual of their liberty as other persons exploit them for personal or commercial gain. This document sets out the policy of RETN Capital (the "Company") with the aim of the prevention of opportunities for modern slavery to occur within its businesses or supply chain. This policy's use of the term "modern slavery" has the meaning given in the Act.

RETN Capital operates 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 business or those of our suppliers.

4. Prevention

We are committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains, consistent with our disclosure obligations under the Modern Slavery Act 2015. We expect the same high standards from all of our contractors, suppliers and other business partners, and we are evolving and updating our contracting 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. We expect our suppliers to hold their own suppliers to the same high standards.

All team members have an obligation to familiarise themselves with our procedures to help in the identification and prevention of modern slavery and to conduct business in a manner such that the opportunity for and incidence of modern slavery is prevented. Adherence to this policy forms part of all team members' obligations under their contract of employment.

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 four measures:

- i. conduct risk assessments to determine which parts of our business and which of our suppliers are most at risk of modern slavery so that efforts can be focused on those areas;
- ii. engage with our suppliers both to convey to them our Anti-Slavery Policy and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses;
- iii. where appropriate, as informed by our risk assessment, seek to introduce supplier pre-screening (for example as part of our tender process) and self-reporting for our suppliers on safeguarding controls;
- iv. introduce contractual provisions for our suppliers to confirm their adherence to this policy and accept our right to audit their activities and (where practicable) relationships, both routinely and at times of reasonable suspicion.

5. Responsibility

Ultimate responsibility for the prevention and prevention of modern slavery rests with the Company's Top Management. The Chief Executive Officer of the Company has overall responsibility for ensuring this policy and its implementation complies with our legal and ethical obligations.

Management 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.

6. Reporting

6.1 Whistleblowing Procedure

The Company's Whistleblowing Procedure is intended to provide guidance on how concerns can be communicated to the Company. Concerns about suspected modern slavery associated with the Company or our suppliers may be reported by employees in this manner.

In summary, a team member should approach a company director with the nature of the complaint who will determine the company's next course of action.

6.2 Confidential Feedback Line

Those who are accessing this policy because they:

- are seeking a business relationship with us/our businesses or
- already have a business relationship with us/our businesses

are also advised to familiarise themselves with the main features of our measures for combating modern slavery: Suspicious Activity Confidential Line +44 (0) 20 75176400.

This line may be accessed by employees or any other person wishing to raise a concern. You should call this line in any of the following circumstances:

- You suspect a person acting on behalf of RETN Capital is seeking to exploit another in a way which could amount to modern slavery;
- You suspect that a person acting on behalf of one of our suppliers is seeking to exploit another in a way which could amount to modern slavery;
- You have received an approach from a person acting on behalf of RETN Capital who has invited you to participate in acts which could result in offences under the Modern Slavery Act 2015 being committed;
- You have information which leads to the rational conclusion that a person acting on behalf of RETN Capital or suppliers is preparing to commit, is committing or has committed an act in contravention of the Modern Slavery Act 2015.

Reports to the Suspicious Activity Confidential Feedback line (“the Line”) are kept in confidence, subject to the need for RETN Capital to act responsibly and within the law. The source of reports to the Line will be kept confidential, save to the extent that our maintaining that secrecy or the anonymity of the source is not permitted by law, or is not consistent with our maintaining our adequate procedures for the prevention of modern slavery being committed on our behalf or in any element of our supply chain.

6.3 Direct communication

The Company encourages members of the public or people not employed by us to email in confidence any concern, issue or suspicion of modern slavery in any part of our business or related supply chain.

6.4 Safeguards

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. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. 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.

Any claims or allegations made which are found to be malicious or vexatious will result in disciplinary action being taken against the individual.

7. Communication and Awareness of This Policy

Our zero-tolerance approach to modern slavery must be communicated to all suppliers, contractors and business partners at the outset of our business relationship with them and reinforced as appropriate thereafter.

8. Review

This policy was approved by the Chief Executive Officer on 01/06/2022 and is subject to annual review.



Tony O'Sullivan
Chief Executive Officer
RETN Capital Ltd

20 February 2024

9. Declaration

I, the undersigned, have read and understood this policy in its entirety and agree to comply with it in full and without exception.

Name (Please print): _____ **Signature:** _____

Date: ___/___/___