



# **Modern Slavery Statement 2025**

## Introduction

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This statement is made as part of the RTC Group's commitment to eliminating the exploitation of people under the Modern Slavery Act 2015 (the Act).

The statement is published in accordance with section 54 of the Act and relates to the financial year ending 31 December 2024. It was approved by the board of directors on 18 June 2025.

## Our Organisational Structure and Operations

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RTC Group Plc is an AIM listed recruitment business that focuses on white and blue-collar recruitment, providing temporary and permanent labour to a broad range of industries and customers, in both domestic and international markets, through its geographically defined operating divisions.

### UK Division

Through our Ganymede and ATA brands the Group provides a wide range of recruitment services in the UK.

Ganymede specialise in recruiting the best technical and engineering talent and providing complete workforce solutions to help build and maintain infrastructure and transportation for a wide range of UK customers. Ganymede is a market leader in providing a diverse range of people solutions to the rail, energy, construction, highways and transportation sectors. With offices strategically located across the country, Ganymede provides its customers with the benefit of a national network of skilled personnel combined with local expertise.

Ganymede tailors its solutions to suit its customers' needs. Whether it's recruiting permanent and temporary technical, engineering and safety-critical roles or providing fully managed workforce solutions of recruitment, training, account management, contingent labour and fleet provision, Ganymede works closely with its customers to understand their requirements, keeping their goals in mind every step of the way.

ATA provides high-quality technical recruitment solutions to the manufacturing, engineering and technology sectors. Working as an engineering recruitment partner supporting businesses across the UK, ATA has a strong track record of attracting and recruiting the best engineering talent for our customers. ATA's regional offices which are strategically located in Leicester and Leeds each have dedicated market experts to ensure ATA delivers excellence to both our customers and candidates.

### International Division

Internationally, through our GSS brand, we work with customers across the globe that are focused on delivering projects in a variety of sectors. GSS has a track record of delivery in some of the world's most hostile locations. Working closely with its customers GSS provides contract and permanent staffing solutions on an international basis, providing key personnel

into new projects and supporting ongoing large-scale project staffing needs. GSS typically recruit across a range of disciplines and skills from operators and supervisors, through to senior management level.

## **Group Headquarters**

The Group headquarters are located at the Derby Conference Centre which also provides office accommodation for its operating divisions in addition to generating rental and conferencing income from space not utilised by the Group.

The Group has approximately 196 employees based in the UK and has a total annual turnover of circa £97 million.

## **Nature of our Supply Chains**

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Our key supply chains comprise of suppliers who provide goods and services to the Group, as well as those who assist us in providing services to our clients such as payroll companies and workers who provide services via limited companies.

## **Our Policies**

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Our commitment to acting both ethically and with integrity is fundamental to all our business dealings. This approach is reinforced through various policies and procedures including our Modern Slavery and Anti-Bribery and Corruption policies. We take a zero-tolerance approach to all forms of modern slavery and bribery and corruption and this approach is explained to our employees at induction and then reinforced through more detailed training which is refreshed regularly. We require all our employees to adhere to our policies and procedures and they are aware of the requirement to highlight any breach of policy or concerns they may have to us as soon as is reasonably possible.

## **Our Approach**

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We acknowledge that our businesses are at risk of being infiltrated by modern slavery and human trafficking and understand that addressing that risk demands continuous and proactive measures. Accordingly, we are committed to enhancing and expanding our previous initiatives to strengthen our approach to combatting modern slavery.

We identify our International business (GSS) as the business most vulnerable to modern slavery and human trafficking. However, we recognise that each of our businesses faces unique risks and threats. Consequently, each business allocates its resources to address its specific challenges. Below, we outline the measures we have implemented:

## **Actions taken specific to GSS:**

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- We have reviewed our Supplier Risk assessment in relation to Modern Slavery.
- We continue to use our Supplier Questionnaire which includes specific questions relating to Modern Slavery as part of our new supplier due diligence.
- We are continuing to comply with the requirements of CTiP (Combatting Trafficking in Persons).
- We continue to use our robust process to review new suppliers which includes amongst other things, all suppliers signing up to our CTiP Policy and confirmation that their employees working on our projects have been briefed and will adhere to our Human Rights Policy.
- Our employees have undertaken US Department of Defence Combatting Trafficking in Persons (CTiP) training.
- We continue to use the candidate declaration in our contractors' contractual arrangements, this requires them to confirm that they understand that our services are free to them and that they haven't paid any fees to either GSS or anyone else in the supply chain. They are also given our direct contact details if they have any concerns in relation to their declaration.
- Our sub agents / suppliers are continuing to be audited by ourselves and approved by our main client(s) following a lengthy due diligence / audit process to ensure they are legitimate and are continuing to adhere to processes.
- We continue to use our Contractor Handbook which includes details of all relevant GSS policies including Anti-Bribery and Corruption, Modern Slavery and Ethical Recruitment along with a questionnaire to ascertain if the contractor has been dealt with in accordance with our policies.
- Our job adverts continue to detail that no fees will be requested by ourselves or sub-agents, this is then reiterated to operatives throughout the recruitment process.
- We detail an alert on our website home page highlighting to job seekers that false job offers are prevalent in the International Job Market, we reiterate that GSS never charge for recruitment services and provide an email for job seekers to use to check if a vacancy is genuine.
- We continue to work to our Compliant Recruitment Principles which all employees have signed up to.
- We have provided modern slavery refresher training for all employees.

- Our Modern Slavery Policy continues to be reviewed and updated annually and is available on our website.
- We have revised our website to include dedicated Modern Slavery resources.
- We have developed a scoring system to assess high-risk suppliers' approach to Modern Slavery and to help suppliers identify areas for improvement.
- We have developed an "Open Door" policy for reporting instances of Modern Slavery.
- We have displayed CTiP posters in prominent locations at our offices.
- We have completed a client specific CTiP's Compliance Plan.

### **Actions taken specific to Ganymede and ATA:**

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- We have progressed with our detailed Modern Slavery Risk Assessment in relation to our suppliers and have issued Modern Slavery due diligence questionnaires to those suppliers identified as high risk. This allows us to further evaluate their modern slavery approach and processes in greater detail.
- We have developed a process for carrying out spot check audits within our supply chain to ensure suitable right to work checks are being completed.
- We have launched our Code of Business Ethics which outlines our ethical business practices including our commitment to preventing Modern Slavery.
- We have maintained certification to the Achilles Ethical Business Programme.
- We continue to work to our Responsible Recruitment Policy which details our commitment to recruiting responsibly and never charging fees for our services.
- All employees involved in the recruitment or deployment of temporary workers are required to sign up to our Compliant Recruitment Principles.
- All potential suppliers are pre-screened through our Approved Supplier Process which includes questions in relation to their existing safeguarding controls and practices in relation to preventing modern slavery occurring within their organisation.
- We have provided modern slavery training for all directly employed new starters and refresher training for our current employees.
- We have further raised awareness of modern slavery, through our induction training, and modern slavery policy statement.

- We only use FSCA accredited payroll companies which require businesses to confirm steps taken to prevent slavery and exploitation within their supply chain.
- We continue to work to robust placement processes which include compliance checks and identity checks, these processes are reviewed in line with changes in legislation and best practice.

## **Actions taken within the Group as a whole:**

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- Our modern slavery steering group continues to meet quarterly to review the actions we have taken to date including reviewing progress against our KPI's, and identifying and implementing further best practise.
- Our modern slavery steering group members have undertaken further training delivered through the Supply Chain Sustainability School.
- We continue to utilise a number of resources including the Supply Chain Sustainability School and Stronger Together to help support the actions of the modern slavery steering group and champions.
- Our modern slavery champions meet quarterly to identify activities to help raise awareness of modern slavery to our employees, workers and contractors and promote the different ways concerns can be reported along with suspicions of exploitation.
- Our modern slavery champions promoted Anti-slavery week (14 – 20 October 2024) by sending out an awareness email each day of the week highlighting different aspects of Modern Slavery including ways to help employees recognise the signs of modern slavery and to understand how to respond should they come across it.
- Our direct employees have undertaken refresher training on modern slavery.
- We continue to brief all new direct employees on our Modern Slavery policy at their induction.
- Our employees are reminded of the need to raise any concerns regarding human trafficking and exploitation, no matter how insignificant they feel they may be.

## **Further Actions**

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We understand that eliminating the risk of exploitation within our Group and across our supply chain is an ongoing challenge, necessitating continuous efforts. With this in mind, we are committed to implementing the following steps over the next 12 months (January to December 2025):

- Continue to monitor our progress against our modern slavery KPI's and ensure actions are taken to achieve these.
- Continue to review and where necessary update company specific Modern Slavery Policies.
- Progress our supply chain risk assessments in each business, highlighting our highest risk suppliers and focusing our actions on our greatest risks.
- Roll out Stronger Together Recruiter specific training to relevant employees.
- Provide general modern slavery training to all other direct employees to continue to raise awareness of modern slavery and human trafficking risks to our businesses.
- GSS employees will undertake US Department of Defence Combatting Trafficking in Persons (CTiP) training on an annual basis.
- GSS will roll out an Ethics Questionnaire to contractors to include questions about Modern Slavery.
- GSS will continue to rollout Combatting Trafficking in Persons (CTiP) training to its high risk suppliers.
- Ganymede will maintain certification to the Achilles Ethical Business Programme.
- Ganymede will review and re-submit the Modern Slavery Assessment Tool (MSAT) in order to further improve their score.
- Ganymede will introduce Supplier specific KPI's in order to track and monitor progress against any audit findings.
- Continue to utilise Supply Chain Sustainability School and Stronger Together toolkits and other resources to ensure that we are utilising the most up to date resources to help eliminate the risk of modern slavery.
- Continue to provide adequate resources to effectively implement our Modern Slavery policies and procedures.



Andy Pendlebury  
 Executive Chairman and Chief Executive  
 18 June 2025