



*In business to do business*

# Modern Slavery & Human Trafficking Statement

## Introduction

This statement is published in accordance with the Modern Slavery Act 2015. It sets out the steps taken and action planned to prevent modern slavery and human trafficking in our businesses and its supply chain.

It sets out the steps taken during the year ending 31 March 2023, and action planned to prevent modern slavery and human trafficking in the businesses and its supply chain.

## About

RO Trading is a family run company that can trace its roots back over 90 years; it only operates in the UK.

Based upon the founding principle that the company is 'In business to do business' this straightforward direct approach has seen it thrive over the years through careful engagement in a diverse range of interests, which continues to this day.

Presently the company works in the property sector through asset management, refurbishment and development, procurement of land, house building and also early-stage investing focusing on PropTech, CleanTech and FinTech. As part of its social responsibility programme, it also provides substantial support to local community charitable projects and causes as well as providing opportunities for employees to be involved in a range of charitable initiatives.

The company places an important emphasis on integrity throughout its businesses and has a rigorous approach to health and safety and ethical business practices. This statement forms part of our commitment to ensure that there is no modern slavery or human trafficking in our supply chain or in any part of our business.

## Supply chain

Due to the nature of our operations, we engage with a large number of suppliers, manufacturers, consultants, contractors and sub-contractors. Our supply chain includes the engagement of contractor organisations to carry out works and services on our development sites and the sourcing of materials and manufactured products.

We have developed long-standing relationships with our suppliers, manufacturers, consultants, contractors and sub-contractors and make clear our expectations of business behaviour and our high level of standards expected.

We appoint principal contractors and expect that all materials used in our developments and refurbishments are procured from sources that have not been identified as being at risk from modern slavery and human trafficking. We strive to monitor the people we work with by utilising systems we have in place for media news and financial alerts and checks.

## Policies and values

We have a number of policies and values which together address our commitment to eliminating the risk of modern slavery and human trafficking taking place within our businesses and in our supply chain, as well as ensuring we act ethically and with integrity in all our business relationships. This includes our policies and values on:

- Anti-bribery & Corruption
- Whistleblowing
- Equal Opportunities, covering:
  - Fixed-term Employees & Agency Workers
  - Recruitment & Selection
- Employee Handbook and Employee Promise
- Group Occupational Health and Safety Management System
- Sustainability Commitment



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## **Employees**

Our recruitment processes are reviewed regularly. We have procedures in place for the vetting of new employees and undertake references and checks to confirm their identities. Employees are paid directly into an appropriate, personal bank account. We have policies and procedures in place to ensure compliance with UK employment and human rights laws and all staff are remunerated fairly and above the UK's national living wage.

We encourage employees to report in good faith any issues or concerns they may have regarding unethical business practices.

## **Performance Indicators for 2023 - 2024**

### **1. Monitoring and educating our staff and supply chain**

All staff continue to be provided with annual online compulsory training which delivers information on the definition of modern slavery and human trafficking, practical examples of how slavery and/or human trafficking can take place within our businesses and our supply chains. Reinforcement of how to report any concerns of modern slavery and/or human trafficking is provided to all of our staff and supply chain periodically.

We will encourage our staff and anyone in our supply chain to report in good faith any issues or concerns they may have regarding unethical business practices.

### **2. Undertaking due diligence to ensure compliance**

As part of our ongoing commitment to compliance, we use Constructionline (or a similarly recognised accreditation scheme) and require those eligible within our supply chain to become members, encouraging Gold level membership (or equivalent). This level of membership allows for the monitoring of subscribing supplier members, thereby minimising the risk of modern slavery and human trafficking in our supply chain.

Constructionline will provide questions that supplier members need to complete in order to be visible on Constructionline and comply with legislation, with questions that require full disclosure of their employees' eligibility to work in the UK including details of their action taken to eradicate slavery in their workforce, where appropriate.

As part of our pre-qualification process, we will look to include questions that require confirmation of compliance with legislation. This would also cover non-construction businesses that we work with or those not covered by Gold membership with Constructionline or a similarly recognised accreditation scheme.

### **3. Our approach to tackling the issue of modern slavery**

If we identify anyone within our supply chain who are at a higher risk of unfair working practices, modern slavery or human trafficking, we will undertake a more in-depth assessment and require those suppliers, manufacturers, consultants, contractors and sub-contractors to complete a detailed self-assessment questionnaire.

At construction site level, we require Principal Contractors to actively promote the "Stronger2Gether" campaign: [Construction - Stronger Together](#)

We will continue to monitor the supply chain to assess the risk of slavery and human trafficking being present and develop measures to further mitigate against any such risk.