

Slavery and Human Trafficking policy - Riventa Ltd January 2019

Forced, bonded or compulsory labour, human trafficking and other kinds of slavery and servitude represent some of the gravest forms of human rights abuse in any society. We will not tolerate any such activities within our own operations or within our supply chain and are committed to taking appropriate steps to ensure that everyone who works for Riventa – in any capacity, anywhere in the world – benefits from a working environment in which their fundamental rights and freedoms are respected.

While this is our first public statement addressing these issues in line with the requirements of the new UK Modern Slavery Act (2015), we have been focused on the rights and wellbeing of the people who work for Riventa – and for our suppliers – for many years.

Beliefs and principles

We fully acknowledge our responsibility to respect human rights as set out in the International Bill of Human Rights. The IBHR informs all of our policies related to the rights and freedoms of every individual who works for us, either as a direct Riventa employee or indirectly through our supply chain. We are also committed to implementing the United Nations Guiding Principles on Business and Human Rights throughout our operations.

Respect for the dignity of the individual – and the importance of each individual's human rights – form the basis of the behaviours we expect in every workplace worldwide. We will not accept any form of discrimination, harassment or bullying and we require all of our management staff to implement policies designed to increase equality of opportunity and inclusion for all Riventa employees.

We have also developed and implemented policies and processes which are intended to extend these commitments through our supply chain. These include requiring suppliers to take measures to avoid any form of forced, bonded or compulsory labour (or any other kind of slavery or human trafficking)

Codes and policies

Riventa's code of conduct underpins everything we do. The code is mandatory and extends to every individual working for or on behalf of Riventa. The code requires all of us to act ethically and comply with legal requirements at all times, putting our principles into practice in everything we do.

Our code of conduct was updated during the 2015-16 financial year to expand the references to human rights:

We respect all internationally proclaimed human rights, including the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organization's Declaration on Fundamental Principles and Rights at Work. We strive to ensure that we are not complicit in human rights abuses. We shall, in all contexts, seek ways to honour the principles of internationally recognised human rights, even when faced with conflicting requirements. We are also committed to implementing the United Nations Guiding Principles on Business and Human Rights throughout our business operations.

Monitoring and compliance

Potential new suppliers rated as higher risk are required to provide evidence that they operate ethically and responsibly in line with our requirements; this may include a thirdparty audit by a credible independent source. The supporting data provided is then reviewed by the relevant policy and operational experts within Riventa who will reject a supplier from being on-boarded if they do not meet our requirements and, in the company's view, have no prospect of doing so even with support and remediation. If the information provided is found to be unsatisfactory, further on-site assessment may be required to verify compliance with the standards set out in the code. If a new supplier is found to be noncompliant, where feasible we try to work with them to help enhance their capabilities and address the issues of concern.

Responsible for delivery of our commitment

StRamet

Stephen Barrett B.Eng (Hons), MBA, MIoD Managing Director Riventa Ltd

January 2019

This policy is available to all interested parties through publication on our company notice board.