



## MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

of RSK Group Limited & its subsidiaries

for the Financial Year ending 31 March 2024

The UK Modern Slavery Act 2015 requires certain businesses to publish a statement setting out the steps taken in the previous financial year to demonstrate that slavery and human trafficking are not taking place in their supply chains or own business.

RSK Group Limited and seven of its subsidiaries, RSK Environment Limited, Binnies UK Limited, W.G.M (Engineering) Limited and MWH Treatment Limited, PD&MS Energy (Aberdeen) Limited, RSK ADAS Limited and WysePower Limited are obliged to publish such a statement. RSK Group Limited, as parent company, is publishing this statement on behalf of itself, RSK Environment Limited and all its subsidiaries (the “**RSK Group**”), with the exception of the MWH Treatment Limited which publishes its own statement. The RSK Group legal structure chart is available at [www.rskgroup.com](http://www.rskgroup.com).

### RSK ORGANISATIONAL STRUCTURE & SUPPLY CHAINS

We are a multidisciplinary consulting and technical services group of companies providing specialist environmental, engineering, health and safety support services. RSK is headquartered in the UK but operates globally.

Our operations are split into nine divisions: Environment and Planning, Geosciences and Engineering, Technical Services, Agriculture Land & Property Management, Sustainable Engineering Solutions, Europe & Latam, Global, Australia and Smart Futures Delivery. Together they deliver a broad range of services, primarily within the following sectors:

- Energy and power
- Transport
- Property and construction
- Government
- Manufacturing
- Food and drink
- Professional services
- Water
- Waste
- Mining

We employed approximately 15,000 people worldwide at the end of March 2024. Our network of over 250 offices spreads across the UK, continental Europe, the Middle East, Asia Pacific, Africa and South America.

We manage a complex and extensive supply chain network that spans globally with 17,000 suppliers across over 200 businesses in the above sectors. Our supply chain footprint covers a diverse range of products and services where we are dedicated to ensuring ethical standards and responsible practices are upheld throughout our network.

### GOVERNANCE

**The RSK Group board of directors has overall responsibility for compliance with our legal and ethical obligations, and that all those under its control comply with it.**

The primary and day-to-day responsibility for working to take all reasonable and practical steps to prevent Modern Slavery and Human Trafficking within our organisation are the **Divisional Director**



**and Managing Director** for each RSK Group company or business and the **Head of each Group Central Function** for each of our central support function departments. The Divisional Directors, Managing Directors and Head of each Group Central Department, with support from our **General Counsel & Company Secretary**, are responsible for monitoring the use and effectiveness of these steps, dealing with any queries about it, and auditing internal compliance control systems and procedures.

**The Managing Director of each RSK Group company or business outside the UK is also responsible for identifying where local legislation and culture differs from the requirements of this statement, together with our Modern Slavery Policy and working to reflect these differences and identify arrangements where appropriate.**

## **RSK ORGANISATIONAL POLICIES**

We recognise slavery and human trafficking are significant human rights issues and are committed to take all reasonable and practicable steps such that there is no slavery or human trafficking in our organisation and supply chains. Our commitment to the protection of human rights is embedded in our Ethics Code, our 2030 Sustainability Strategy and Sustainability Policy, our Procurement Policy and our HR policies including Recruitment Policy and Right to Work Policy.

Our Anti-Slavery and Human Trafficking Policy provides a clear statement of our position on combatting slavery and human trafficking in our organisation and our supply chains. We have further embedded our approach to combatting slavery and human trafficking, promoting the need for vigilance, in our Ethics Code.

Awareness and understanding of the Group's Whistleblowing Policy and procedure is promoted to all employees, suppliers, contractors and stakeholders through the publication of the Group's Ethics Code. Additionally, the Whistleblowing training module on our learning platform, which is to be completed by all employees and forms part of our induction for new staff members, provides guidance on how to report any slavery or human trafficking concerns that individuals may have.

We wish to make our policies and procedures more accessible and shall be working on our key policies, including our Ethics Code being available in multiple languages. In FY25 a new Human Rights Policy Statement is being developed.

## **DUE DILIGENCE PROCESSES & RISK ASSESSMENT**

We are committed to implementing and enforcing effective systems and controls to satisfy ourselves that slavery and human trafficking is not taking place anywhere in our organisation and supply chains. Our aim is to raise awareness and promote the importance of respect and advocating human rights and take all reasonable steps to prevent harm. Our approach will be to align with the United Nations (UN) Universal Declaration of Human Rights, the International Labour Organisations (ILO's) Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights (UNGPs) and the Organisation for Economic Co-Operation and Development's (OECD) Guidelines for Multinational Enterprises.

### ***In our organisation***

All RSK Group employees are recruited in accordance with clear HR procedures designed to comply with local legislation, including checks for eligibility to work in the host country, references, proof of a National Insurance Number (UK) and bank details. This demonstrates each person is acting in his or her own right. We also comply with national living wage requirements.



The RSK Group supplements its internal resources from time to time with support from third party services. The use of temporary agency workers is undertaken to provide the flexibility to react and support operating requirements where demand requires. We require all agencies to have appropriate processes in place to demonstrate that all temporary agency workers are acting in their own right. Having introduced our Preferred Suppliers List (“PSL”) process for agency usage last year, we are continuing with the extensive roll out of this process to all our Group businesses to create a more rigorous appointment process.

All employees are required to complete the Company induction which includes a specific online awareness training module in respect of combatting slavery and human trafficking, which they are required to refresh at regular intervals. Alongside this, our Anti-Slavery & Human Trafficking Policy sets out our position in respect of slavery and human trafficking and, together with the training, helps employees and anyone acting for or on behalf of the RSK Group to understand what modern slavery is and what our responsibilities are in respect of the prevention, detection and reporting of modern slavery in our business and supply chains.

We have a whistleblowing policy for individuals to raise concerns which is made available to all employees, suppliers, third parties and stakeholders, whether this is directly to a line manager, point of contact within the group or our external email address with a corresponding online training module which is available to all employees.

### ***In our supply chains***

The RSK Group spends over £800 million each year on goods, services and raw materials to support the running of the business and the delivery of its projects.

Goods and services are predominantly procured locally by the relevant RSK Group business, following prescribed vendor evaluation and purchasing procedures which are monitored by senior management. Achilles are our primary method of supplier evaluation at Group and we are working to scale-up the number of suppliers enrolled. Our current risk assessment in respect of modern slavery and human trafficking focuses on country of operation and business activity.

The RSK Group has continued its rapid growth strategy during FY24, both organically and through the acquisition of complementing businesses. As part of the new business integration process, we are continually reviewing and aligning our procurement processes across the RSK Group such that they are fit for purpose in our growing organisation and developed in line with current good/best practice to prevent slavery and human trafficking taking place anywhere in our supply chains.

We reviewed our supplier evaluation questionnaires in 2023 and confirm that they include appropriate and proportionate checks in respect of our suppliers’ policies and procedures in respect of modern slavery.

Our Group standard purchasing terms make specific reference to the modern slavery and human trafficking legislation, and ensure suppliers are contractually obliged to comply with our policies and procedures, together with informing us as soon as they become aware of any instance of modern slavery or human trafficking taking place in their business or supply chain.

### **MEASURING EFFECTIVENESS**

We have neither identified nor received disclosures of instances of slavery or human trafficking in our organisation or supply chain.



We will keep under review, monitor and assess how effective we are in demonstrating that slavery and human trafficking are not taking place in any part of our organisation or supply chain, and we will take and implement all appropriate steps and measures to act on the findings and outcomes of any such reviews and assessments and maximise our effectiveness and continual improvement.

## **TRAINING AND AWARENESS**

We have an online awareness training module for all employees in respect of combatting slavery and human trafficking, which employees complete as part of their induction and refresh as part of their ongoing training programme. All employees undertaking the training are assessed on their understanding with questions throughout the course, which need to be completed to successfully pass the course. We will be continuing to assess the needs for more in-depth training across the RSK Group in FY25.

In FY24 Group Procurement have used the Supply Chain Sustainability School for more in depth sustainable procurement training, including in depth modules on Modern Slavery.

In FY24 Group Procurement utilised our partnership with the Supply Chain Sustainability School to provide Modern Slavery awareness training to over 100 key suppliers. This training plan will continue throughout FY25.

RSK Group became a member of Supply Chain Sustainability School Modern Slavery Leadership Group in FY24 to ensure that we look at opportunities where possible to align our approach to combatting modern slavery and labour exploitation, through the upskilling of our own workforce and our wider supply chain. RSK are proud to be part of a group which is the largest anti-slavery collaboration in the UK built environment.

## **NEXT STEPS**

We will be implementing the following steps in the next financial year in our efforts to continuously improve and combat any modern slavery and human trafficking in our organisation and supply chains:

1. To communicate and embed our new Human Rights policy which will incorporate Modern Slavery and to continue to review and translate other key policies, procedures and training into additional languages to ensure greater accessibility.
2. To improve our human rights due diligence processes (including modern slavery risk) across our own operations and measure the effectiveness of these activities by undertaking a group-wide human rights risk and gap assessment. Developing an internal online compliance portal, to include Modern Slavery, across the Group to have better visibility of risk areas that the Group is or could be exposed to, and the measures we can use to mitigate those risks and what lessons can be learned.
3. To improve our supply chain human rights due diligence (including modern slavery risk), this will include continued work for the roll out of our Achilles supplier evaluation and approval process, updating our internal supplier evaluation tool for suppliers not suitable for Achilles to ensure similar scrutiny. A bespoke supplier web portal has been developed in FY23 for collation and update of relevant supplier company information and third-party accreditation for larger suppliers with User Acceptance Testing (UAT) and supplier roll out.
4. To continue to raise awareness within the Group and ensuring that all training modules are accessible on all devices and in multiple languages.



5. To continue to utilise the training provisions through the Supply Chain Sustainability School and to offer sustainable procurement training, which will include modern slavery as part of the business units annual ESG plans.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes RSK Group's slavery and human trafficking statement for the financial year ending 31 March 2024.

A handwritten signature in black ink that reads "Alan Ryder". The signature is written in a cursive, flowing style.

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**Dr Alasdair Alan Ryder**  
**Chief Executive Officer**  
**RSK Group Limited**

Date: 27 June 2024