



# Modern Slavery and Human Trafficking Statement

## Organisation

This statement applies to RTS Technology Solutions Ltd t/a Vanti (referred to in this statement as 'the Organisation'). The information included in the statement refers to the financial year 2022-2023.

## Organisational structure

The Organisation predominantly operates from three types of location:

- The business' registered headquarters at 44 Upper Gough Street, Birmingham, B1 1JL
- Client sites, which are predominantly UK based but also include locations across the world
- Employees' homes (or other remote working locations), most of which are in the West Midlands

The Organisation includes static teams centred around a common function (such as design, development, and support), and dynamic teams which come together to complete specific projects. There are also teams dedicated to the operations of the business as a whole, focusing on areas including governance and business improvement. The Organisation has a Leadership Team comprised of seven individuals, three of whom are the only Statutory Directors and two who are co-owners of the business. There is no board and no shareholders other than the two Directors.

The main activity carried out by the Organisation is the design, delivery, and support of technological solutions including integrated systems, audio visual technologies, and IT infrastructure. Demand for our services is consistent throughout the year and is therefore not seasonal.

The labour supplied to the Organisation in pursuance of its operation is carried out in the UK (predominantly the West Midlands and London) and Europe (Ireland, The Netherlands, Belgium, and Finland).

## Definitions

The Organisation considers that modern slavery encompasses:

- human trafficking
- forced labour, involving mental or physical coercion
- ownership or control exerted by an employer through abuse or the threat of abuse
- dehumanisation, treating individuals as commodities, or their sale as property
- physical restraint or limitations on freedom of movement

## Commitment

The Organisation acknowledges its responsibilities in relation to tackling modern slavery and commits to complying with the provisions in the Modern Slavery Act 2015. The Organisation understands that this requires an ongoing review of both its internal practices in relation to its labour force and, additionally, its supply chains.

The Organisation does not enter into business with any other organisation, in the United Kingdom or abroad, which knowingly supports or is found to involve itself in slavery, servitude and forced or compulsory labour.

No labour provided to the Organisation in the pursuance of the provision of its own services is obtained by means of slavery or human trafficking. The Organisation strictly adheres to the minimum standards required in relation to its responsibilities under relevant employment legislation in the UK and in many cases exceeds those minimums in relation to its employees.

## Supply chains

In order to fulfil its activities, the main supply chains of the Organisation include those related to the delivery of projects and services using equipment and products from various suppliers internationally. We seek to develop strong working relationships with suppliers to ensure we deal with companies that adhere to the ethical standards we have ourselves. We understand that the Organisation's first-tier suppliers are intermediary traders and therefore have further contractual relationships with lower-tier suppliers.

## Potential exposure

The Organisation considers its main exposure to the risk of slavery and human trafficking to exist in its technology supply chains because they involve the provision of labour in a country where protection against breaches of human rights may be limited.

In general, the Organisation considers its exposure to slavery/human trafficking to be relatively limited. Nonetheless, it has taken steps to ensure that such practices do not take place in its business nor the business of any organisation that supplies goods and/or services to it.

## Steps

The Organisation carries out due diligence processes in relation to ensuring slavery and/or human trafficking does not take place in its organisation or supply chains, including conducting a review of the controls of its suppliers.

The Organisation has not, to its knowledge, conducted any business with another organisation which has been found to have involved itself with modern slavery.

In accordance with section 54(4) of the Modern Slavery Act 2015, the Organisation has taken or is planning on taking the following steps to ensure that modern slavery is not taking place:

- Reviewing our supplier contracts to include termination powers in the event that the supplier is, or is suspected, to be involved in modern slavery

- Reviewing the vetting process for our supply chain to endeavour to ensure they meet their legal obligations under the Modern Slavery Act 2015.
- Ensuring we carry out due diligence in order to identify and assess the potential risks in our supply chains
- Taking a zero-tolerance policy towards modern slavery

## Key performance indicators

The Organisation has set the following key performance indicators to measure its effectiveness in ensuring modern slavery is not taking place in the Organisation or its supply chains.

- Anti-slavery codes of conduct issued to all new clients
- All employees involved with Procurement to have undertaken Anti-Slavery training by the end of the financial year

## Policies

The Organisation currently has no other policies which further define its stance on modern slavery, but we will seek to develop a modern slavery policy and build anti-slavery measures into our corporate social responsibility policy, supplier code of conduct, and recruitment policy.

## Slavery Compliance Officer

The Organisation has a Slavery Compliance Officer, to whom all concerns regarding modern slavery should be addressed, and who will then undertake relevant action with regard to the Organisation's obligations.

This statement is made in pursuance of Section 54(1) of the Modern Slavery Act 2015 and will be reviewed for each financial year.

Date of approval: 14<sup>th</sup> August 2023

Signed: *A Cohen*

Print name: Alisha Cohen

Job Title: People Director

Date: 14<sup>th</sup> August 2023