

## RMS Anti-Slavery Policy

**January 1, 2024**

### 1. Introduction

Resource Management Service, LLC (“RMS”) is committed to promoting ethical working practices and ensuring that modern-day slavery and human trafficking have no place in our operations, our direct suppliers, or those aspects of our business over which we exercise control. We recognize that slavery is a grave violation of human rights and is fundamentally inconsistent with our values.

This policy sets out our standards in connection with modern-day slavery.

### 2. What is slavery?

2.1 Modern slavery can be divided into four activities:

|                                   |  |
|-----------------------------------|--|
| <b>Slavery</b>                    | Exercising powers of ownership over a person.  |
| <b>Servitude</b>                  | The obligation to provide services is imposed by the use of coercion.  |
| <b>Forced or compulsory labor</b> | Work or services are exacted from a person under the menace of any penalty and for which the person has not offered themselves voluntarily, including child labor. |
| <b>Human trafficking</b>          | Arranging or facilitating the travel of another person with a view to their exploitation.  |

2.2 Modern slavery is a complex and multi-faceted crime. At a basic level, preventing exploitation, child labor and human trafficking, and protecting our workforce and reputation makes good business sense.

2.3 With this in mind, we need to pay particular attention to our suppliers and any outsourced activities, particularly in jurisdictions that may not have adequate labor safeguards.

### 3. Responsibilities

3.1 Everyone must observe this policy and be aware that turning a blind eye is unacceptable and not an option.

3.2 The Company

a) We will:

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- (a) maintain policies and procedures aimed at preventing exploitation and human trafficking, and protecting our workforce and reputation;
- (b) be clear about our recruitment policy (see Recruitment);
- (c) check our suppliers (see Supply chains);
- (d) have in place an open and transparent grievance process for all staff;
- (e) seek to raise awareness so that our colleagues know what we are doing to promote appropriate welfare practices; and
- (f) make a clear statement that we take our responsibilities to our employees and our clients seriously (see Anti-slavery statement).

### 3.3 Managers

- a) Managers will:
  - (a) listen and be approachable to colleagues;
  - (b) remain alert to indicators of slavery (see Identifying slavery); and
  - (c) raise the awareness of our colleagues, by discussing issues and providing training, so that everyone can spot the signs of trafficking and exploitation and know what to do.

### 3.4 Colleagues

- a) We all have responsibilities under this policy. Whatever your role or level of seniority, you must:
  - (a) keep your eyes and ears open—if you suspect someone (a colleague or someone employed by a supplier) is being controlled or forced by someone else to work or provide services, follow our reporting procedure (see Reporting slavery);
  - (b) follow our reporting procedure if a colleague tells you something you think might indicate they are or someone else is being exploited or ill-treated; and
  - (c) tell us if you think there is more we can do to prevent people from being exploited.

## 4. The risks

4.1 The principal areas of risk we face, related to slavery and human trafficking, include:

- a) some components of our direct supply chain; and

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b) temporary service staff.

4.2 We manage these risk areas through our procedures set out in this policy.

## 5. Our procedures

### 5.1 Anti-slavery statement

a) We make a clear statement that we take our responsibilities to our employees, people working within our suppliers and our clients seriously; and

b) We make this statement on our website.

### 5.2 Supply chains

a) We check our direct supply chain – i.e., those parties with whom we contract directly -to reduce the potential for slavery and human trafficking;

b) We instruct the companies we do business with that we are not prepared to accept any form of exploitation;

c) We will seek (in so far as is applicable to the context of the contract) to include in all our significant supplier contracts, (for industries considered high risk), an anti-slavery clause. This clause will ask suppliers and their employees to commit not to engage in slavery or human trafficking and to diligence their own supply chain; and

d) We work to account for our supply processes—we know who is providing goods and services to us and we have mechanisms and processes in place to check, including reviewing our significant suppliers' identity and level of risk in this area, and making efforts to confirm their adherence to anti-slavery measures in their businesses.

### 5.3 Recruitment

a) Using agencies

(a) Our HR department follows firm policy and only uses agreed specified reputable recruitment agencies.

(b) To reduce the potential for slavery and human trafficking, we diligence recruitment agencies before adding them to our list of approved agencies. This includes:

(i) investigating reputation; and

(ii) asking the agency to provide assurances that the appropriate checks have been made on the person they are supplying.

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- (c) We keep agents on the list under regular review.
  - b) General recruitment
    - (a) We verify staff are legally able to work in the relevant office; and
    - (b) We provide information to all new recruits on their statutory rights including sick pay, holiday pay and any other benefits they may be entitled to.
- 5.4 If, through our recruitment process, we suspect someone is being exploited, the HR department will follow our reporting procedures (See Reporting slavery).

## **6. Identifying slavery**

- 6.1 There is no typical victim and some victims do not understand they have been exploited and are entitled to help and support.
- 6.2 However, the following key signs could indicate that someone may be a slavery or trafficking victim:
- a) The person is not in possession of his or her own passport, identification or travel documents;
  - b) The person is acting as though they are being instructed or coached by someone else;
  - c) They allow others to speak for them when spoken to directly;
  - d) They are dropped off and collected from work;
  - e) The person is withdrawn or they appear frightened;
  - f) The person does not seem to be able to contact friends or family freely; and
  - g) The person has limited social interaction or contact with people outside their immediate environment.

This list is not exhaustive.

- 6.3 Remember, a person may display a number of the trafficking indicators set out above but they may not necessarily be a victim of slavery or trafficking. Often you will build up a picture of the person's circumstances, which may indicate something is not quite right. If you have a suspicion, report it.

## **7. Reporting slavery**

- 7.1 Talking to someone about your concerns may stop someone else from being exploited or abused. If you think that someone is in immediate danger, call the police. Otherwise, you should discuss

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your concerns with Compliance staff or your manager who will decide a course of action and provide any further advice.

- 7.2 Not all victims may want to be helped and there may be instances where reporting a suspected trafficking case puts the potential victim at risk, so it is important that in the absence of an immediate danger, you discuss your concerns first with Compliance Personnel (or your manager before taking any further action.

## **8. Training**

- 8.1 We will provide training to those staff members who are involved in managing recruitment and our suppliers relating to the identification and reporting modern day slavery. More general awareness training is provided to all staff through induction training sessions and periodic electronic refresher alerts.

## **9. Monitoring our procedures**

- 9.1 We will review this policy regularly. We will provide information and/or training on any changes we make to staff as applicable.

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