

Rigby Group (RG) Plc

Slavery and Human Trafficking Statement for the year ending 31 March 2023

Introduction

The UK Modern Slavery Act 2015 (the “Act”) requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains.

Pursuant to section 54(1) of the Act, this statement refers to the financial year ending 31 March 2023 and sets out the steps taken by the Rigby Group (RG) plc (**RG**) and its UK subsidiaries (**Rigby Group**) to prevent modern slavery and human trafficking in our own supply chains. RG is the holding company for various UK subsidiary companies which each operate in different sectors. Whilst as a holding company RG does not meet the threshold set out in the Act for publishing a Modern Slavery Statement, the ownership places great importance on the issues of modern slavery and human trafficking such that it sets strategy and approach at a group level and resolved to publish a group statement. That being said, for the year ending 31 March 2023, there are a number of entities within Rigby Group which are individually required to publish a statement under the Act. Those entities are SCC plc, Nuvias UC Limited, Rigby Capital Limited and Bournemouth International Airport Limited. Their statements can be located using the following links:

- SCC plc at <https://www.scc.com>
- Nuvias UC Limited at <https://nuvias-uc.com>
- Rigby Capital Limited at <https://www.rigbycapital.com/en/>
- Bournemouth International Airport Limited at <https://www.bournemouthairport.com>

Our Commitment

As a private family-owned business, the Rigby’s own family values underpin our culture and ethical policies. Respect for the various stakeholders and the wider community is an established principle for Rigby Group and we strive always to perform transparently, collaboratively and to the highest standards of business conduct at all times. The values-led business is built around three core principles:

- **Foresight** – The intuition is underpinned by our experience.
- **Working Hard** – Rigby Group is committed to achieving excellence in all that it does.
- **Enabling Others** – We have a federated approach to its valued team, liberating companies within the Rigby Group and trusting their leaders to be the very best they can be; providing expert and highly personal leadership and swift-yet-sound decision making, always with an eye firmly on the long-term outcome.

Rigby Group is committed to conducting business in a manner that respects human rights and the dignity of all people. We acknowledge our responsibilities in accordance with the Act and we do not tolerate any conduct that contributes to, encourages or facilitates human trafficking, child labour, forced or compulsory labour, or any other human rights abuses.

Business Structure

Rigby Group is a family-owned highly successful business operating across Europe. Diversifying from our origins as a technology re-seller, Rigby Group currently comprises five key divisions: Technology, Airports, Real Estate, Hotels and Technology investments. Each division sits within a different legal

entity. Since our origins in 1975, Rigby Group has grown to be the 12th largest family business in the UK employing over 8,000 people and with a consolidated turnover of over £4 billion. Rigby Group has a distinguished reputation as both an investor and business operator built around the core principles set out above. Renowned for independent thinking, our ability to follow through and our approach to acquiring and nurturing businesses, we enable companies within the Rigby Group to be the very best they can be.

We are a trusted partner to government, the military, global corporations, major charities, and thousands of medium-sized organisations.

Proud to be part of the West Midlands economic powerhouse, we are keen supporters of job creation and enterprise in the region, take our responsibility for the environment seriously, and remain active in the community. Our Charitable Trust, the Rigby Foundation, supports a wide range of causes and our employees participate in initiatives that not only benefit society, but their own development too.

Rigby Group's Operations and Supply Chains

Rigby Group is an incredibly diverse business. Each division is particularly distinct from another which means that we must be acutely aware of the many different facets of our operations and be alive to the challenges we face within each individual supply chain.

For example, in our Hotels division we offer a number of different customer experiences including overnight stays, spa breaks or afternoon teas, each of which require a number of different supply chains. This could include staying in a room which has been cleaned that morning by an agency cleaner, eating breakfast in the dining room which has been supplied by a local farmer followed by a spa treatment which is carried out by suitably qualified staff using products which have been sourced and supplied by a well-known brand.

Our supply chains are extensive given the diversity of our operations. Within the various supply chains the key areas are labour (including sub-contracted labour and agency workers), property, materials, goods and equipment. We actively encourage and require our suppliers to also operate in such a way that respects human rights and the dignity of all people. On the basis that the majority of our supply chain is based in Europe and / or the USA, we do not consider that the countries from where our supplies are sourced are high-risk from the perspective of modern slavery and human trafficking. We operate honestly and fairly with our suppliers and, as such, we create and retain professional commercial working relationships based on trust and mutual respect. We have good relationships with existing trade unions and / or works councils in the applicable countries in which we operate and it is of great importance to us, as a group, to maintain good communication and rapport with such organisations.

Proactive steps to prevent modern slavery

Starting with our own business operations and service providers and then increasing the visibility we have of our global supply chains, we work to identify actual or potential risks of modern slavery and help ensure remediation where cases are identified.

During the course of the financial year, the Rigby Group has been proactively identifying and implementing steps that can be taken to ensure that we are open and transparent in the way we operate our businesses, thus ensuring that our transactions and relationships are firmly compliant with our responsibilities under the Act.

These steps can be summarised into three areas: policies and procedures, risk assessment and due diligence.

Policies and Procedures

Each division currently has in place its own policies and procedures on key matters. The policies and procedures reflect the three core principles of Rigby Group and the importance it places on matters such as modern slavery and human trafficking. The policies across the Rigby Group consist of ethics and business conduct, bribery and corruption, health and safety, whistleblowing and importantly, corporate criminal offences, and anti-slavery and human trafficking. RG periodically reviews its policies to ensure they are maintained to the highest standard and are reflective of current legislation and market practices. The policies are recognised as being an important tool for documenting how to conduct ourselves as a business and individually in such a way which is appropriate, transparent and respectful of others.

During a recent review, RG has identified that each different division may have different policies and procedures in place which address key matters such as anti-slavery and human trafficking and it proposes to adopt a unified approach across such policies throughout the upcoming financial year. RG has already begun such a process with regards to whistleblowing. During the financial year ended 31 March 2023, RG carried out a review of its whistleblowing policy and its effectiveness. As a result, we are in the process of adopting a new policy with related software to ensure quick and easy accessibility to all staff (worldwide). The software will ensure staff are able to raise concerns about malpractice or wrongdoing in confidence and with ease, to reflect the “speak up” culture which is key to Rigby Group’s core principles.

RG has not received any reports of nor discovered any instances of slavery or human trafficking within its supply chains. However, were any to arise, the board of directors would take the matter very seriously and act swiftly to audit the supplier (where an allegation only is made) and / or terminate any operations with the supplier (where such practices are proven) with immediate effect. Reporting on such matters would take place through Rigby Group’s Audit, Risk and Remuneration Committee (further information in our Risk Assessment section below).

Training of employees in the key areas such as modern slavery, bribery and ethics and business conduct remains a priority for the Group and so is the ability for employees to have ready access to other educational and awareness materials. Any training on these areas is, and will continue to be, mandatory.

With regards to procedures across the Rigby Group, the ongoing monitoring and development of pre-contract and post contract processes and procedures are fundamental in order to identify and assess potential risk areas in our supply chains, mitigate the risk of slavery and human trafficking occurring in our supply chains and monitoring such risk areas.

Risk Assessment

We assess the potential human rights risks of our supply chains by considering the origin of our suppliers and by understanding and monitoring their approach to modern slavery. We endeavour to keep abreast of emerging risks through regular and transparent relations with our suppliers and, in particular, maintaining strong relationships with our labour force who form a significant proportion of our supply chain.

We have identified that sub-contract labour and agency workers is one of the main areas where there is a risk that human trafficking and modern slavery could occur.

We therefore continue to work with our contractors, suppliers, business partners and other third-party suppliers or businesses to ensure that they are open and transparent in their activities and are compliant with the Act.

The Group has an established Audit, Risk and Remuneration Committee which, in addition to the management of both internal and external audit processes and financial reporting, has a strong focus on risk management. Each division has their own Enterprise Risk Owner, a divisional board member who manages a process to identify and document key enterprise risks which are then reported to the Risk Committee for discussion with the ownership of the Group. To the extent any concerns or risks regarding modern slavery are identified these will be dealt with the utmost priority and measures will be implemented to eradicate any such risks to the extent possible.

Due Diligence

RG and the other members of the Rigby Group have established specific supplier onboarding policies which ensure the following checks are carried out (as a minimum):

- carry out financial due diligence;
- confirm company details with applicable registers;
- carry out IR35 assessments;
- map the supply chain broadly to assess particular product or geographical risks of modern slavery and human trafficking;
- evaluate the modern slavery and human trafficking risks of each new supplier;
- use <https://www.modernslaveryregistry.org>, where suppliers can be checked for their labour standards, compliance in general, and modern slavery and human trafficking in particular; and
- use approved recruitment agencies or accredited umbrella companies when recruiting temporary labour for internal and operational requirements.

During the upcoming year, RG will extend the supplier onboarding process to require suppliers to comply with the Group's applicable conduct requirements and / or policies and procedures and, for those divisions where there is a higher risk of slavery and / or human trafficking, the applicable Group entity will carry out audits of such suppliers to ensure ongoing compliance.

We will continue to maintain transparent partnerships with our suppliers to ensure they are regularly considering the impact of the Act on their organisations. Where appropriate, we will also continue to look at streamlining the number of suppliers across the Group to mitigate any risk associated with having multiple suppliers and to engender greater partnerships so as to align our values more closely. We have many longstanding trusted suppliers with whom we have developed very good relationships and therefore have a much better understanding of the ways in which they operate. This reflects the business model of RG and allows us more comfort regarding the possible risks.

Future steps to prevent modern slavery in our supply chains

We understand that risks of modern slavery are dynamic and can change quickly. We will continue to monitor the modern slavery risk by way of policy, risk assessment, training and due diligence and will seek to measure the effectiveness of steps taken to minimise such risk on a regular basis.

During the course of the next financial year, RG has set itself the following objectives relating to modern slavery which will be assessed and measured at the end of the next financial year:

- to review the Rigby Group’s current business objectives to ensure they do not make the supply chain vulnerable to slavery and human trafficking;
- to consolidate the Rigby Group’s policies which address slavery and human trafficking to ensure a unified approach;
- to extend the supplier onboarding process; and
- to ensure training is provided to all staff when joining Rigby Group.

We reiterate that issues of such severity as slavery and human trafficking are of great importance to the ownership, which continues to encourage and promote a safe, fair and honest workplace for its staff and those of its suppliers.

This statement was approved by the board of Rigby Group (RG) Plc.

Signed:



James Rigby
Co-CEO
Rigby Group (RG) Plc



Steven Rigby
Co-CEO
Rigby Group (RG) Plc

Dated: 9th May 2023