

Slavery and Human Trafficking statement made by the Chief Executive of the RED Group on behalf of all companies within the Group for the purposes of the Modern Slavery Act 2015.

We are proud of the conditions of employment enjoyed by all employees throughout the RED Group and the steps we have taken to combat slavery and human trafficking.

Given the nature of our business, RED's Board of Directors and Management teams consider that there is minimal risk that either the RED Group or its supply chains which support our business activities are in any way involved in, supportive of, or complicit in slavery or human trafficking.

The employment and procurement practices operated by RED ensure that companies within the group commit to act ethically and with integrity in all business relationships; enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our business or in any of our supply chains. We expect the same high standards from all our contractors, suppliers and other business partners.

RED Group Structure

RED Group, including its main trading entity Red Commerce Limited, is primarily a staffing and IT consulting business that sources and supplies the services of skilled IT professionals ("consultants") to provide services to its customers on a permanent or contractual basis. These consultants are either engaged directly by RED or through a business-to-business arrangement. The ultimate parent company, Red Topco Limited, and the main trading subsidiary, Red Commerce Limited, are incorporated in the United Kingdom and headquartered in London. RED also operates offices in Germany, Switzerland and the USA and has over 240 employees worldwide. The RED Group operates largely in these jurisdictions, but also conducts business in many other countries around the world.

RED Supply Chains

RED's supply chains are limited to the provision of staffing and recruitment solutions. We engage technically skilled professionals in the IT sector as well as general professional service organisations. We operate a tiered preferred supplier list (PSL), all of whom have been subject to careful due diligence and periodic auditing to analyse both their sustainability and credibility.

We use routine services for the maintenance and support of our office operations such as cleaning and technical support services for such things as IT, telephones and communications infrastructure.

We do not act as a producer, manufacturer or retailer of physical goods and have no supply chain in relation to such activities.

Anti-slavery policy statement

"The RED group has zero tolerance to slavery and human trafficking and is committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business."

This anti-slavery policy statement is the principal articulation of the RED Group's policy on slavery and human trafficking. It is intended to inform and influence all the operational procedures within the RED Group and is a focal point of reference when the company seeks tenders for service or when RED carries out routine audit and compliance screenings of our suppliers.

Due Diligence and Implementation Processes

The RED Group operates primarily in industries and with consultants that would not ordinarily be considered to be at risk of the perils of modern slavery and human trafficking. Notwithstanding this, we take our obligations and responsibilities in this regard very seriously and, as part of our initiative to identify and mitigate risk, we operate a range of policies and procedures appropriate to the RED Group's structure and operations.

These include:

Remuneration: RED works closely with all its business partners to ensure that proposed remuneration corresponds to the services and general market conditions. RED is compliant with all National Minimum Wage Acts and does not supply workers to clients on zero-hour contracts.

Recruitment Procedures: RED's recruitment procedures involve a combination of direct applications, referrals, targeted headhunting activities and the utilisation of our extensive global network of candidates. All employees who join the RED Group and consultants that we provide to clients are subject to background checks to ensure they are genuine applicants, operating as free agents with the appropriate qualifications.

RED's internal recruitment team is sufficiently trained to comply with the best recruitment practices to verify the identity, experience, qualifications and availability of the expert providing the services. Every consultant we engage is required to provide evidence of their identification, right to work (if applicable) and references which are verified prior to commencing work. Screenings are also undertaken to ascertain the nature of the relationship between the consultant and the entity with whom we are contracting when such arrangements are on a business-to-business basis.

Whistleblowing: RED encourages all its workers, customers and other business partners to report any concerns related to its direct activities or supply chains as soon as possible. Such concerns are investigated by our dedicated Legal & Compliance department and any irregularities are escalated to the CEO and Board of Directors.

On-Boarding Procedures for Consultants:

Compliance checks: When on-boarding new consultants and other third-party suppliers, RED obtains documentation to assist in carrying out compliance checks. Contractual assurances regarding ongoing compliance with our requirements and adherence to employment practices are routinely sought. RED monitors all placements at all stages in the recruitment process where identification and compliance checks have not been carried out. Any reluctance to provide key compliance documents is investigated promptly and thoroughly.

Payments: Payments are only made to the contracting entity of suppliers once contractual assurances have been provided that the person performing the services is legally employed or engaged by the entity providing the services; including compliance with relevant labour laws, immigration laws and minimum wage legislation.

Working conditions: RED works closely with all clients to ensure that the working conditions provided at the client site meet the relevant working standards. Assurances regarding health & safety are routinely sought and provided.

RED Group companies articulate a series of employee rights and benefits available to employees in the employee handbooks and individual contracts of employment for each member of staff.

Corporate Governance: RED Group operates a HR department led by the Group Head of HR and a Legal department led by the Group Head of Legal & Compliance. All internal audit issues and risk assessment duties are met by the CFO. RED Group also operates an Operational Board which includes the country and/or divisional directors within the group, all of whom have reviewed and agreed to the terms of this statement. Each of these departments and executives have reporting responsibilities to management and the various boards of companies within the RED group.

The RED group uses the services of KPMG as its external auditor. A combination of these procedures and functions operate to help identify, assess and monitor potential risk areas in our operations and mitigate the risk of slavery and human trafficking occurring in our supply chains.

Training: Our commitment to addressing the issue of modern slavery will be shared with our staff to ensure a high level of understanding of the topic. The subject matter shall be included in the RED Group's mandatory training and information materials.

SIGNED on behalf of the Company

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07-Jan-2026 | 17:17 GMT
Date.....

Ross Eades
Chief Executive Officer