	Modern Slavery and Human Trafficking Statement	**Ref:**	AMG/POL/HSQE/019
		Issue Date:	October 2023
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		Issue No.	5

Introduction

This Modern Slavery Policy Statement has been created in accordance with Section 54 of the Modern Slavery Act 2015 relating to Transparency in Supply Chains.

Auctus Management Group Ltd **(AMG)** comprises of RSS Infrastructure Ltd. The Group recognises that it has a responsibility to take a robust approach to modern slavery/human trafficking and takes a zero-tolerance approach to non-compliance with the Act in any part of its business or its supply chain.

This statement sets out the steps AMG and its subsidiary companies will continue to take to address the risk of slavery and human trafficking within its operations and supply chain.

To ensure that AMG conforms with its legislative requirement, the statement has been verified and uploaded to the TISC site. AMG has also signed up to the Supply Chain Sustainability School's 'People Charter,' to demonstrate its commitment to eradicating unethical and unlawful employment practices.

Organisational Structure

AMG and its subsidiaries operate predominantly within the rail, construction, and utilities sector.

AMG operates in the UK and has circa 190 direct employees and approximately 300 contractors. The organisations registered Head Office is in Birmingham, Aston and the Group also has offices in Cwmbran and Doncaster.

Our Business

AMG continues to grow organically through its subsidiary RSS Infrastructure Ltd. The Group intends to continue to expand and develop by delivering excellent service solutions as welling as embedding good practices which demonstrate a commitment to eradicating modern slavery.

RSS Infrastructure is a leading provider of integrated infrastructure solutions for the construction, civils, and rail sectors. With a comprehensive range of integrated services, we are committed to providing high levels of customer service, quality, and safety to our clients.

Our Governance for Modern Slavery

AMG's Executive Committee has overall responsibility in respect of the approach to Modern Day Slavery.

AMG's Executive Committee has established a 'Modern Slavery Working Group' to review the approach to Modern Slavery, co-ordinate and monitor the activities of the business in this regard and conduct a gap analysis/risk assessment of its policies/procedures and supplier onboarding process. Policies and Procedures are only implemented once approved by the Board of Directors.

The group involves representatives from Procurement/Commercial, HR (People & Culture), Communications, HSQES, and Legal.

Our Legislative Commitment

AMG is committed to supporting the elimination of acts of modern slavery and human trafficking; accordingly, the company can confirm its commitment to the following:

- UN Declaration of Human Rights.
- UN Guiding Principles on Business and Human Rights.
- Core Conventions of the International Labour Organisation.
- Prohibition of forced or compulsory labour for employees, contractors, and sub-contractors.
- Prohibition of employees, contractors, and sub-contractors being forced into involuntary labour, coercion at work and/or financial penalty as a disciplinary sanction.

Within the company's remit, AMG encourage others, such as third-party suppliers with access to AMG or client property, systems or data, and any other parties working on behalf of AMG, to confirm their commitment to this legislative requirement.

AMG considers that adherence to these Acts, alongside the Section 54 of the Modern Slavery Act 2015, is its moral duty and legal responsibility. In addition, this statement has been developed in line with the company's corporate values and ethical code.

Our Policy on Slavery and Human Trafficking

AMG is fully committed to reducing the risk of modern slavery or human trafficking occurring in its supply chain or in any part of its business with a zero tolerance for non-compliance.

This Policy applies to all AMG employees as well as, suppliers and subcontractors, who must ensure that both their businesses and supply chains worldwide comply with this Policy.

This Policy reflects that commitment to acting ethically and with integrity in all business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in the supply chain.

Suppliers and subcontractors must comply and act in accordance with this Policy.

AMG has an effective grievance and whistle blowing process and policy in place to manage and investigate any concerns within the business or the supply chain.

Communication

AMG has implemented a robust communications programmes to ensure all employees, and particularly those with purchasing/buying responsibility, are aware of their responsibilities. This statement is routinely communicated through initial inductions, monthly team meetings, toolbox talks, and training.

This policy statement on the topic of modern slavery is available via 'SageHR' and each of the company websites for all employees to access.

Whistleblowing

AMG have facilities available to raise concerns through its Whistleblowing Policy and has incorporated the 'Modern Day Slavery Hotline' within its mobile application. For confidential matters, teams have access to a HR reporting system known as 'SageHR.' Through its policies/procedures, AMG encourages personnel to communicate confidentially with the Health and Safety Executive, the Audit Commission, or CIRAS.

Our Supply Chains

AMG's supply chains include:

- Plant, vehicles, and equipment suppliers
- Subcontractors and other service providers
- Suppliers of contingent labour

- Manufacturers and suppliers of goods and materials

Procurement of services and suppliers is undertaken by specialists with the experience and training needed to identify modern slavery within the supply chain. The intention is to build and maintain long term sustainable relationships with suppliers encouraging collaborative working and exchange of innovative and good industry practices.

During the annual audit process, AMG communicates best practice, highlight risks, and works with the supplier/subcontractor to identify mitigations.

The supply chain includes approximately 400 suppliers of varying size and expertise.

The onboarding process includes a questionnaire to ensure the following guidelines are entrenched within each supplier:

- No forced labour or human trafficking is practiced, and employment is freely chosen.
- Working conditions are safe and hygienic.
- Working hours are not excessive.
- Compliance with National Minimum Wage.
- No child will be exploited.
- No harsh, cruel, or degrading practices are allowed.
- No discrimination is practiced.

A failure to satisfy the above criteria is an absolute bar to pre-qualification as a supplier/subcontractor.

Certain areas require an enhanced level of diligence and AMG has taken a category specific approach, assessing the risk of Modern Slavery occurring within its business notwithstanding whether the deliverable is outsourced or delivered in-house. The emphasis of this approach is therefore focused on those categories considered most at risk.

The following categories are considered to be of highest risk of Modern Slavery occurring:

- Provision of Personal Protective Equipment
- Recruitment
- Cleaning Supplies and Services
- Provision of Temporary Staff

A declaration to confirm support of the Modern Slavery Act 2015 will be contained within the company's updated supplier contracts and existing suppliers will be required to complete this declaration upon renewal.

Code of Practice

As part of the company's 'Approved Supplier Process,' AMG requires suppliers to sign up to its Code of Practice to help embed ethical employment practices throughout the supply chain. Moreover, this process guarantees that suppliers do not 'blacklist' and that workers are free to join a Trade Union or collective agreement and able to raise worker concerns without risk of discrimination.

Prompt Payment Code

AMG does not exhort any undue cost/time pressures onto its suppliers to reduce the likelihood of unethical treatment of works. Within existing frameworks/contracts, AMG procures 100% of training, plant, accommodation, welfare, material, and equipment from local suppliers. As a member of the 'Prompt Payment Code,' AMG has committed to paying suppliers 20% faster than the industry norm to maintain cash flow through its supply chain.

Recruitment & Due Diligence

As part of its recruitment process, AMG ensures both itself and its supply chain conform with its Right to Work Procedure and Recruitment/Selection Procedure, which includes the Eligibility to Work in the UK procedure.

AMG's Right to Work Policy requires responsible personnel to undertake pre-employment screening that includes identity checks and confirmation of entitlement to work in the UK for all employees prior to commencing employment.

AMG's approval process includes an internal quality assurance audit which confirms that both the business and its supply chain conform with the Modern Slavery Act and that employees/subcontractors are not subject to recruitment fees or discriminatory practices, which would result in non-payment of wages or withholding of documentation.

Training

AMG has implemented a comprehensive training programme covering Modern Slavery and a range of other ethical matters. The concept of modern slavery is discussed within the company's induction programme and during specialist training courses provided on the subject of Equality, Diversity, and Inclusion.

The company effectuates vigorous Modern Slavery training via resources on the Supply Chain Sustainability School, ensuring that those involved in purchasing, recruitment, and deployment of workers, are trained, and updated.

As part of the onboarding process, each employee is given an overview of the essential policies and information in relation to those policies, procedures, and other matters such as whistle blowing.

2023 Priorities

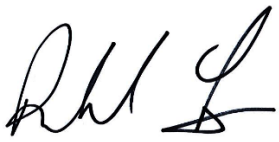
In 2023, AMG will progress the following actions:

- Establish and embed its new training programme raising the awareness of Modern Slavery to all employees.
- Implement a site audit process in respect of Modern Slavery
- Continue to collaborate with industry partners to ensure best practice is being applied.

This statement is pursuant with section 54(1) of the Modern Slavery Act 2015 and comprises of AMG's slavery and human trafficking statement for the financial year.

This statement shall be reviewed on at least an annual basis and more frequently should circumstances require it.

The statement has been approved by the Chief Executive Officer and the Board of Directors of Auctus Management Group Ltd.



Richard Toy - Chief Executive Officer

August 2023