



# Modern Slavery Act Statement 2024



## Introduction

This statement by Restore plc and its trading subsidiaries (being Restore Digital Limited, EDM Group Limited, Capture All Limited, Restore Technology Limited, Ultratec Limited, Restore Datashred Limited and Harrow Green Limited) (together “Restore” or the “Group”) has been published in accordance with Section 54 of the Modern Slavery Act 2015. It has been approved by the Restore plc Board on behalf of the Group and signed on behalf of Restore by Charles Skinner, Chief Executive Officer.



Charles Skinner, Chief Executive Officer

27<sup>th</sup> June 2024

## Our Commitment

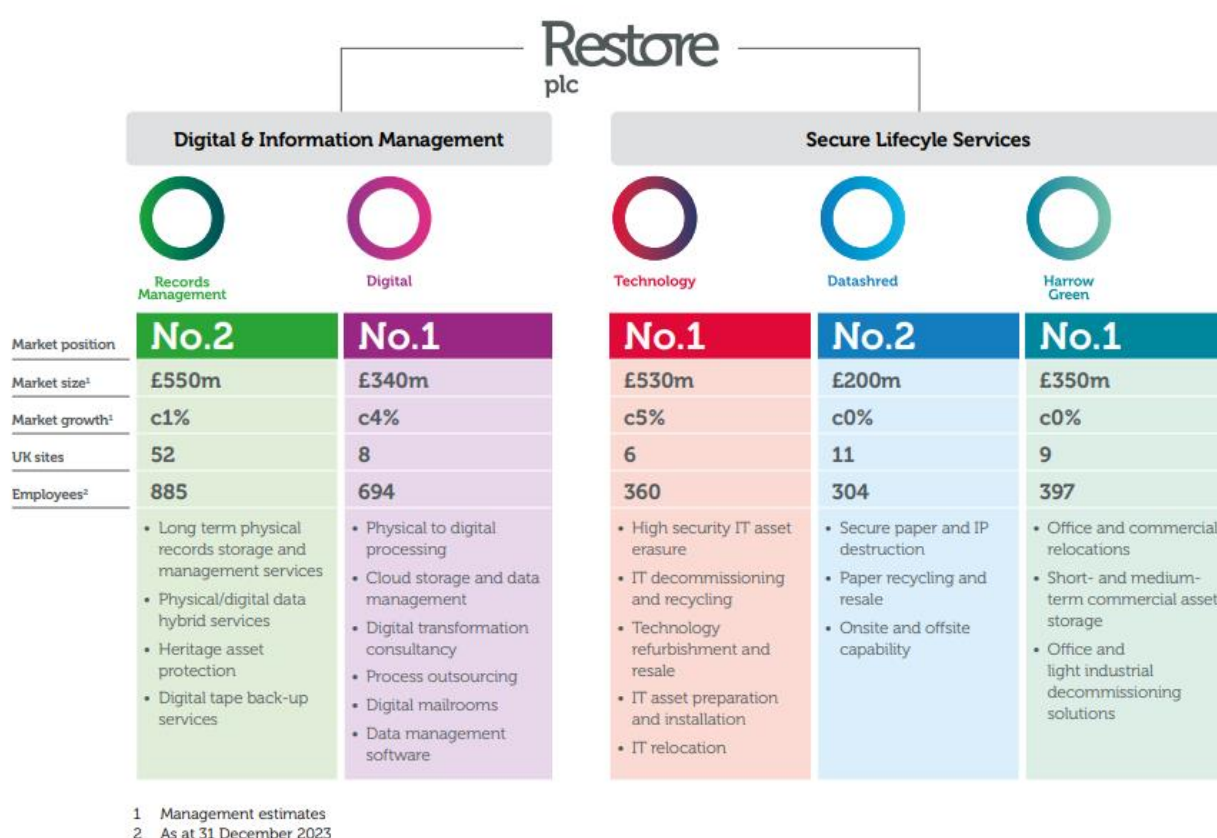
Restore is committed to respecting and supporting all internationally recognised human rights and the treatment of all workers with dignity and respect. Restore operates a zero tolerance policy in respect of all forms of modern slavery and human trafficking within its business and across our supply chains. We take all allegations of human rights abuse seriously. To report any concerns around suspected misconduct, including breach of human rights or the Modern Slavery Act 2015, you may report the issue via Restore’s confidential and independent reporting service by telephoning **0800 915 1571** or reporting online at [www.safecall.co.uk/report](https://www.safecall.co.uk/report).

## Our Business

Restore is the UK's leading provider of document management, secure recycling and relocation services with 2023 annual revenues of c.£277m. The business procures goods and services with a value of c.£130m per year. Our supply chain is principally UK-based.

Restore's business consists of five Business Units. A summary of our business structure and market positioning is shown at Figure 1 below.

Figure 1 – Restore Business Structure & Market Positioning 2023.



## Our Risk Assessment and Management

Restore operates principally in the UK and primarily with UK-based suppliers. Whilst this does not shield us from exposure to modern slavery risk, we assess the risk to be very low. The most likely sources for this risk come from our use of temporary staff to meet short-term customer demand spikes and projects, and our extended supply chain.

For the former we have robust controls for the selection and assurance of employment agencies (see Our People below).

For the latter, whilst we are confident about our direct suppliers, we are seeking to improve our on-boarding and on-going supplier due diligence and to better understand the lower tiers of the supply chain. We are continually exploring ways to enhance our procurement controls (see Our Supply Chain below).

To date, Restore has not received any reported instances of modern slavery, actual or perceived. However, we remain vigilant and continuously challenge ourselves to better understand the risk and the associated controls.

## Our People

Restore operates across five different markets each with its own skill requirements. As at 1<sup>st</sup> June 2024, Restore employed c.2,600 people. All of our managers and leaders are onboarded into the business through a rigorous selection process. The majority of our operative workforce (currently around 70% of the total workforce) are on permanent contracts delivering services to around 55,000 customers. These are augmented by temporary workers (currently c.540 FTE although this fluctuates with business need) sourced from suitably assured agencies.

We operate a stringent vetting process to ensure that Restore is both legally compliant and also compliant with the varying requirements of our customers depending on the nature of their business and the regulations that they themselves are subject to. As mandated in our Right to Work and Screening Policy, all employees are subject to thorough right to work checks and pre-employment screening (which will vary depending on the nature and seniority of the role). In addition, employees may also be subject to a Baseline Personnel Security Standard (BPSS) check, a BS7858 check, a DBS check and also a Security Check (SC)/Developed Vetting (DV) Clearance, again in each case depending on the role, as well as the legal and contractual requirements relevant to the nature of the information processed by an individual.

We continue to operate additional governance around our agency providers to ensure that we understand, track, and monitor the specific workers that are being provided. Every contingent labour supplier is required to sign up to terms to adhere to our policies and requirements, which includes the right to audit. We completed the first of our audit processes in 2022.

As a business, with the worst of the Covid pandemic seemingly behind us, we continue to encourage employees to return to our offices and sites where possible, whilst acknowledging the long-term structural shift towards more flexible working patterns. We do believe that being physically present in an office environment has benefits, not least to help our People and Management teams to maintain personal contact with our workforce. In order to support flexible working and the continued improvement of information flows across Restore, Restore has a flexible working policy, a comprehensive intranet site (Circle), has created workforce forums (for example, Employee Voice Forums, LGBTQ plus, Armed forces and Minority Ethnic Forum amongst others) and we continue to offer Yammer via Restore's intranet for more informal team and organisational engagement.

In 2024 we plan to review our employee on-boarding processes including the implementation of a new on-boarding platform. This will create a uniformed approach to onboarding across the Group and ensure a trackable audit trail of pre-onboarding requirements as well as reportable, digital acceptance of employment terms and conditions and reporting for both candidate and hiring manager tasks. In addition, this will give us the opportunity to further reinforce the key policies and procedures which all employees are required to familiarise themselves with and other policies which are specific to certain roles. As now, the new platform will require new colleagues to confirm that they have read and understood the required policies.

## Our Governance

Figure 2 below illustrates our governance structure. The following describes the specific responsibilities of the governance bodies within this structure (the numbers correlate to the numbers in Figure 2):

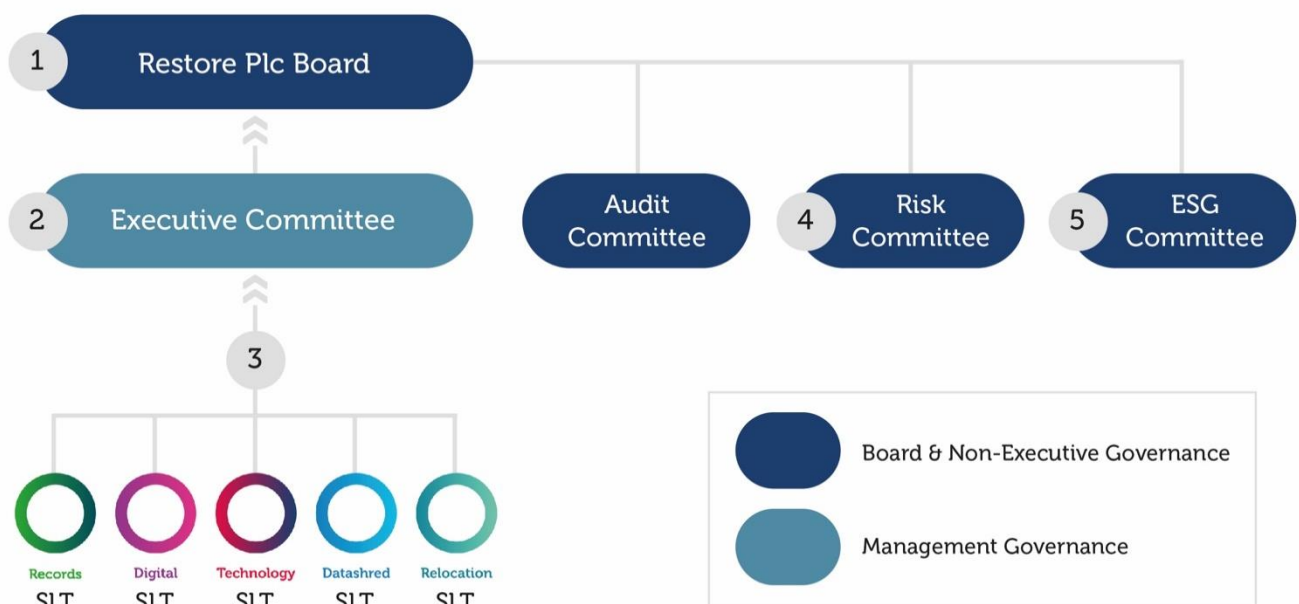
1. Charles Skinner, the Chief Executive Officer, and the Restore plc Board hold ultimate responsibility for our ethics and compliance framework, including our Code of Conduct which (amongst other things) sets out our commitments on respecting human rights and preventing modern slavery. Compliance policies across the Restore Group are reviewed annually with any new policies or changes to existing policies being approved by the Board.
2. The Executive Committee, consisting of the Chief Executive Officer, Chief Financial Officer, General Counsel/Company Secretary and the Business Unit MDs, keeps



ethics and compliance risks across each Business Unit under review, including in relation to human rights, modern slavery, and human trafficking.

3. Business Unit management teams are responsible for upholding our modern slavery commitment across our contracts and external relationships. They do this by ensuring the identification, prevention, and mitigation of any adverse human rights, modern slavery and human trafficking impacts caused or contributed to by Restore operations. They also monitor the actions of our customers, suppliers, business partners and other third parties.
4. The Risk Committee, which reports to the Board and is chaired by Lisa Fretwell (non-executive director), meets quarterly to review risks across the Group including in relation to areas of compliance such as modern slavery and human trafficking.
5. The ESG Committee is chaired by Lisa Fretwell (non-executive director) and consists of all directors of Restore plc. The committee is attended by the Director of Group Finance, the Head of People for our Digital business and the General Counsel/Company Secretary, who have responsibility (respectively) for the environmental, social and governance elements of our Group ESG Strategy, Restoring our World. The Committee meets bi-annually and is supported by sub-committees formed of cross-functional senior employees from across the Group, focussing on (for example) fleet and our property portfolio. As stated in our 2023 Annual Report and described in more detail below, the governance focus for 2024 is on our supply chain.

Figure 2 – Restore Governance Structure



## Our Policies

Restore's compliance programme is led by the General Counsel and Company Secretary who is responsible for our compliance strategy and the associated policies and governance. Our compliance policies are available on our intranet (Circle) with some also available on our external website(s) as appropriate. This includes a full suite of human resource, procurement, and ethical policies. Working principally in the UK, Restore has no need to translate our main policies but we take great care to ensure they are written in a style and format accessible to our colleagues.

The Restore policies relevant to slavery and human trafficking and mitigating the risk around these areas include the following:

1. Code of Conduct: As referenced in our Modern Slavery Statement last year, our Code of Conduct was launched in October 2023. Focussed on our employees, it outlines the values we hold as a company, the way we operate our business and how we treat each other and those we work with.
2. Speak Up Policy: This is the policy that sets out our commitment to open and transparent reporting of concerns within the workplace or otherwise connected with how we do business. It provides the details of our Safecall whistleblowing facility (also included in our Code of Conduct and Supplier Code of Conduct) which is available at all times to both employees and third parties. This policy was refreshed and re-communicated to all employees in February 2024.
3. Supplier Code of Conduct: Again referenced in our Modern Slavery Statement last year, this was launched in June 2024 and describes our expectations as to how our suppliers conduct their businesses.
4. Anti-Bribery and Corruption Policy: Originally launched in 2019, this was most recently refreshed and re-communicated in March 2024, including an updated gift and hospitality declaration process through Circle (our intranet).
5. Dignity at Work Policy: Originally issued in 2019, this policy was most recently updated and re-communicated in November 2023. It outlines Restore's commitment to providing a workplace free from discrimination, harassment, victimisation and bullying.

6. Right to Work and Screening Policy: Originally issued in January 2022, this policy (refreshed and re-communicated in November 2023) describes the checks that are carried out before anyone is employed by Restore and the more involved vetting process for those with access to Government assets or otherwise working in regulated/security environments.

## Our Training

We mandate regular on-line compliance training, including in respect of the Modern Slavery Act, to management teams and other relevant staff members. The on-line training platform was updated in Q1 2024 to improve the user experience and the range of training materials available (including our own internally-developed materials). Importantly the training platform is accessible via an app, which helps us reach colleagues who may not have a computer but will have a smartphone. All employees are required to complete certain mandatory training programmes on an annual basis and the platform allows completion levels to be monitored and followed-up on as required.

The modern slavery training module is designed to raise awareness of slavery and human trafficking in all its forms, to inform colleagues of some of the more obvious indicators that should trigger concern and to empower them to take the right action should they suspect something to be amiss. Additionally, our intranet site has further information, links, and videos for our colleagues to access on the topic of modern slavery.

## Our Supply Chain

As a UK-based business services provider, our supply chain is both relatively small and predominantly UK-based; suppliers are therefore subject to the same strict modern slavery compliance standards as ourselves. The majority of our large suppliers exist in structured markets and provide services to us, for example, property, information technology and energy providers. We therefore assess our supply chain modern slavery exposure to be very low. Moreover, we assure ourselves that our suppliers maintain these standards and we are continually seeking improvements in the way we achieve this:



- We expect our suppliers to have suitable human rights, modern slavery and human trafficking policies and processes in place within their own businesses and to cascade those policies to their own suppliers. This is assured through our procurement processes which require suppliers to complete a detailed supplier evaluation questionnaire.
- We follow the advice and guidance in relation to the Modern Slavery Act 2015 and ensure ongoing improvements are adopted as set out in the Universal Declaration of Human Rights and standards of the International Labour Organisation.

Having recently launched our Group-wide Supplier Code of Conduct, our focus for the remainder of 2024 and into 2025 is on our supply chain and procurement processes, in particular to:

- Embed the Supplier Code of Conduct in our procurement processes so that it forms part of our supplier on-boarding process.
- Review our standard supplier terms and conditions to ensure that compliance with our Supplier Code of Conduct and other key compliance policies and ESG metrics has contractual force.
- Continue the implementation of our selected contract lifecycle management platform to further improve the management of our supplier (and other) contractual relationships.
- Review and improve our supplier on-boarding and due-diligence process to assess new suppliers against a scorecard as well as to review and audit supplier performance against that scorecard on a regular (at least annual) basis.

# Restore



To get in touch, visit us at:  
[restoreplc.com](http://restoreplc.com) and [restore.co.uk](http://restore.co.uk)