



Modern Slavery Policy

Introduction

This policy sets out Romax's actions to understand all potential Modern Slavery risks related to its business and to put in place steps that are aimed at ensuring that there is no slavery or human trafficking in its own business and its supply chains.

Policy Statement

Romax recognises that it has a responsibility to take a robust approach to slavery and human trafficking and is absolutely committed to preventing and eradicating slavery and human trafficking in its corporate activities, and to ensuring that its supply chains are free from slavery and human trafficking. We are a company that expects everyone working with us or on our behalf to support and uphold the measures to safeguard against Modern Slavery and human trafficking.

We are committed to acting ethically and within integrity in all our business relationships. We are committed to implementing and enforcing effective systems and controls to make sure no slavery or human trafficking exists anywhere.

Organisational structure and supply chains

This statement covers the activities of Romax

We help our clients use data more intelligently and produce more effective, joined-up customer communications. Beginning with cleaning their data, Romax guides them through the process as their partner making their experience smooth and adventurous. We help them build strong connections with their audience through off-line and on-line communications, membership welcome packs and other data driven customer touch points. We are good at making difficult things feel simple and intuitive. Our goal is to make the most of their customer communications, maximising efficiencies to build trusted relationships that last.

Countries of operation and supply

Romax currently operates only in the UK.

Responsibility

Ultimate responsibility for upholding our commitment to the prevention of modern slavery rests with the Romax senior management team. They have overall responsibility for ensuring this policy and its implementation comply with legal, moral and ethical obligations. Saying this, managers and supervisors are responsible for checking that those reporting to them understand and comply with this policy and are given adequate and regular training on the issue of modern slavery and how to identify it.

Training

Romax requires employees to complete training on Modern Slavery to ensure they all receive a relevant level of training to raise awareness of modern slavery and human trafficking and the knowledge to address any related issues which may arise.

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We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy. We are committed to ensuring no one suffers any detrimental treatment because of reporting in good faith, their suspicion that Modern Slavery of whatever form is or may be taking place in any part of our own business or in our supply chains. We accept and take seriously concerns communicated anonymously.

The Modern Slavery training covers:

- our business's purchasing practices, which influence supply chain conditions and which should therefore be designed to prevent purchases at unrealistically low prices, the use of labour engaged on unrealistically low wages or wages below the country's national minimum wage, or the provision of products by an unrealistic deadline.
- how to assess the risk of slavery and human trafficking in relation to various aspects of the business, including resources and support available.
- how to identify the signs of Modern Slavery and human trafficking.
- what initial steps should be taken if slavery or human trafficking is suspected.
- how to escalate potential slavery or human trafficking issues to the relevant parties within the organisation.
- what external help is available, for example through the Modern Slavery Helpline, Gangmasters and Labour Abuse Authority.
- what steps Romax should take if suppliers or contractors do not implement anti-slavery policies in high-risk scenarios, including their removal from the organisation's supply chains.

Prevention within Romax

We will take action to address any evidence of Modern Slavery or Human Trafficking.

Awareness-raising programme

As well as training staff, the company has raised awareness of modern slavery issues by putting up posters across the company's premises.

The posters explain to staff:

The basic principles of Modern Slavery Act 2015:

How employers can identify and prevent slavery and human trafficking

What employees can do to flag up potential slavery or human trafficking issues to the relevant parties within the company

Responsibility

Responsibility for the organisation's anti-slavery initiatives is as follows:

- **Anti-Slavery Policy:** HR director is responsible for creating these with the support of BPIF

Risk assessments:

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High-risk activities: We have identified that any of our supply chain providers are a potential risk and as such we audit each supplier on a regular basis and this necessitates that we operate the policies below.

- These are carried out to identify particular sections of our supply chain where modern slavery of any form could take place. We have mitigated these by carrying out onboarding processes for suppliers to identify and understand the supplier's modern slavery statement and their standards of ethics. We have engaged with our suppliers both to convey to them our stance on modern slavery and to gain an understanding of the measures taken by them to ensure modern slavery is not occurring in their businesses. Employee training and ensuring awareness of modern slavery of any form across the business is essential to identifying as well as eradicating Modern Slavery. All Managers are required to follow our supplier onboarding process which ensures that all suppliers in our supply chain have a Modern Slavery statement and are in line with our standards of ethics prior to committing to any work.

Training: Members of staff regularly take a Modern Slavery training course to enhance their knowledge of the various types of modern slavery.

Relevant policies

Romax operates the following policies that describe its approach to the identification of Modern Slavery risks and steps to be taken to prevent slavery and human trafficking in its operations.

- **Whistleblowing policy** - Romax encourages all its workers, customers and other business partners to report any concerns related to the direct activities, or the supply chains of the organisation. This includes any circumstances that may give rise to an enhanced risk of slavery or human trafficking. The organisation's whistleblowing procedure is designed to make it easy for workers to make disclosures, without fear of retaliation. Employees, customers or others who have concerns can speak to the HR director in the strictest of confidence
- **Employee code of conduct** - Romax's code makes clear to employees the actions and behaviour expected of them when representing the organisation. The organisation strives to maintain the highest standards of employee conduct and ethical behaviour when operating and managing its supply chain.
- **Supplier code of conduct** - Romax is committed to ensuring that its suppliers adhere to the highest standards of ethics. Suppliers are required to demonstrate that they provide safe working conditions where necessary, treat workers with dignity and respect, and act ethically and within the law in their use of labour. The organisation works with suppliers to ensure that they meet the standards of the code and improve their worker's working conditions. Our suppliers must adhere to this as part of our supplier onboarding process, and wherever possible only choose suppliers based on their adherence to our ethos and accreditations, so the supply chain is measured, secure and audited. However, serious violations of the organisation's supplier code of conduct will lead to the termination of the business relationship.
- **Recruitment policy** - Romax uses only specified, reputable employment agencies to source labour and always verifies the practices of any new agency through our onboarding processes before accepting workers from that agency.

Due diligence

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The organisation undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The organisation's due diligence and reviews include:

- assess particular product with risks of modern slavery and human trafficking.
- evaluating the modern slavery and human trafficking risks of each new supplier by looking at their policies and confirm their compliance with our Code of Conduct.
- carrying out audits on a regular basis on all suppliers.
- taking steps to improve substandard suppliers' practices, including providing advice to suppliers through BPIF and requiring them to implement action plans.
- invoking sanctions against suppliers that fail to improve their performance in line with an action plan or seriously violate our supplier code of conduct, including the termination of the business relationships.

Performance indicators

The organisation has reviewed its key performance indicators (KPIs). As a result, the organisation has:

- developed a system for supply chain verification whereby Romax evaluates potential suppliers before they enter the supply chain.
- reviewing its existing supply chains whereby Romax evaluates and audits all existing suppliers.

Approval



Directors Name: Robin Sumner

Date: December 7th 2021