



Modern Slavery Statement

Version: v1.1

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Modern Slavery Statement

Roc Technologies Limited (Roc) has taken steps to ensure that slavery and human trafficking are not taking place in our supply chains or in any part of our business.

In accordance with Section 54, Part 6 of the Modern Slavery Act 2015 (the Act), this statement sets out the steps that Roc has taken to ensure that slavery and human trafficking are not taking place in our supply chains, nor in any part of our business. This statement is in respect of Roc's financial year, ending 31st March 2023, and was approved by the Roc Board of Directors on 31st October 2023.

OVERVIEW

The Act requires commercial organisations supplying goods or services with a turnover of more than £36 million to prepare and publish an annual 'Slavery and Human Trafficking Statement'. The statement must set out the steps an organisation has taken, if any, during its financial year to ensure that slavery or human trafficking is not taking place in its business or supply chain.

ABOUT MODERN SLAVERY

Modern slavery is an international crime, affecting millions of people around the world and is an increasing global issue that transcends age, gender, and ethnicities. Sadly, vulnerable people from overseas as well as across the United Kingdom, are forced to work illegally against their will across many different sectors from agriculture, construction, hospitality, retail, manufacturing, and more.

OUR ORGANISATIONAL STRUCTURE AND SUPPLY CHAINS

Roc is a private limited company, incorporated in England and Wales. Our business mainly directly employs professionally qualified people or external contractors who are employed under fixed term contracts for their professional services. Our policies ensure fair treatment of our people regardless of their employment status with Roc. Our external suppliers are mostly UK based companies in low-risk sectors such as professional services, technology and engineering services.

OUR POLICIES IN RELATION TO SLAVERY AND HUMAN TRAFFICKING

Roc has established a zero-tolerance position on violations to the UK's anti-human trafficking and anti-modern slavery laws. Roc's modern slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships. We implement and enforce effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain. If we identify breaches of these laws within our supply chain, we aim to support companies in their efforts to comply with the legislation.

Our values of Striving for Excellence, being Passionate, showing Honesty, being Compassionate, and Making a Difference, are the pillars of our culture. They embody everything that we do at Roc, and how we do business. They outline the expectations of our peoples' behaviour with colleagues, customers and suppliers.

We seek to treat everyone fairly and consistently, creating a workplace and business environment that is open, transparent, and trusted. Our policies and procedures relating to the Modern Slavery Act are in line with our culture and values.

Our specific procedures to address modern slavery risk include:

- A 'Modern Slavery policy' for our people, which sets out the key issues and how we should respond including a process for raising concerns internally;
- A 'Whistleblowing policy', which is designed to make it easy for our people to make disclosures, without fear and retaliation. Anyone with concerns is encouraged to raise them directly with Roc;
- A process for handling complaints raised by Roc customers;
- Employment policies that protect our people from unfair treatment to promote a fair and inclusive workplace;
- Robust recruitment processes in line with relevant employment laws;
- Market-related pay and rewards reviewed annually;
- A Wellbeing strategy and initiatives to support our people's mental and physical wellbeing as well as lifestyle choice;
- A policy for how we engage with suppliers and a 'Supplier Code of Conduct' clarifying the standards we expect.

DUE DILIGENCE PROCESSES, RISK ASSESSMENT AND MANAGEMENT

The implementation of our policies and procedures includes due diligence on suppliers that we engage with, in accordance with our procurement policy. When we welcome a new supplier to Roc, a thorough due diligence process takes place to ensure that the supplier has a good reputation with appropriate practices in a number of areas, including people and culture.

This process consists of a dedicated compliance team with involvement from the following departments:

- Legal
- Audit and compliance
- People
- Procurement
- Sales

Our modern slavery statement forms part of our contract with all suppliers and they are required to confirm that no part of their business operations contradicts this statement.

In addition to the above, as part of our contract with suppliers, we require that they confirm to us that:

- They have taken steps to eradicate modern slavery within their business;
- They hold their own suppliers to account over modern slavery;
- As UK-based suppliers, they pay their employees at least the national minimum wage / national living wage (as appropriate);
- As international suppliers, they pay their employees any prevailing minimum wage applicable within their country of operation.

We may terminate our contract at any time should any instances of modern slavery come to light.

A robust auditing rota and process with our suppliers ensures that products are responsibly sourced, and any issues identified and addressed. As part of our initiative to identify and mitigate risk we have in place systems to:

- Identify and assess potential high-risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential high-risk areas in our supply chains;
- Protect whistle blowers.

TRAINING ON MODERN SLAVERY AND TRAFFICKING

Roc provides comprehensive training to our people about Modern Slavery and our policies to address the risks, that will help to increase education and awareness.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

We log complaints received via our whistleblowing procedure or through other sources, along with the actions taken. We will know the steps we are taking, to ensure that slavery and/or human trafficking is not taking place within our business or supply chain, are effective if:

- No reports are received from our people;
- No reports are received from the public;
- No reports are received from any law enforcement agencies.

To the date of this statement, Roc has had no identified instances of modern slavery.

Roc takes full responsibility for this Modern Slavery Statement as well as its related objectives and will review and update this in accordance with the Act. Suppliers will always find the applicable version of the Modern Slavery Statement on the corporate website of Roc Technologies Limited: <https://roctechnologies.com/>

Richard Jefferies

CFO

Roc Technologies Limited

1st November 2023