

Rigby Capital Limited

Slavery and Human Trafficking Statement for the year ending 31 March 2020

Introduction

The UK Modern Slavery Act 2015 (the “Act”) requires businesses to state the actions they have taken during the financial year to ensure modern slavery is not taking place in their operations and supply chains.

Pursuant to section 54(1) of the Act, this statement refers to the financial year ending 31 March 2020 and sets out the steps taken by Rigby Capital to prevent modern slavery and human trafficking in our own supply chains. Rigby Capital is a subsidiary of Rigby Group (RG) Plc which has published its own statement under the Act which is available at www.rigbygroupplc.com.

Our Commitment

As a subsidiary of a private family-owned business, the family values underpin our culture and ethical policies. Respect for our various stakeholders and the wider community is an established principle for the Rigby Group and we strive always to perform transparently, collaboratively and to the highest standards of business conduct at all times. The Group’s values-led business is built around three core principles:

- **Foresight** – Our intuition is underpinned by our experience.
- **Working Hard** – Rigby Group and its subsidiaries are committed to achieving excellence in all that we do.
- **Enabling Others** – We have a federated approach to our valued team, liberating companies within the Group and trusting their leaders to be the very best they can be; providing expert and highly personal leadership and swift-yet-sound decision making, always with an eye firmly on the long-term outcome.

We are committed to conducting business in a manner that respects human rights and the dignity of all people. We acknowledge our responsibilities in accordance with the Act and we do not tolerate any conduct that contributes to, encourages or facilitates human trafficking, child labour, forced or compulsory labour, or any other human rights abuses.

Business Structure

A multinational, service-based holding company for a portfolio of privately-owned businesses, the Rigby Group is family-owned, and has, since its inception in 1975, built a distinguished reputation as both an investor and business operator. Renowned for our independent thinking, our ability to follow through, and our approach to acquiring and nurturing businesses, we enable companies within the Group to be the very best they can be.

Diversifying from our origins as a principally technology-led business, we are currently comprised of six key divisions: Technology, Airports, Hotels, Real Estate, Aviation, and Finance, of which Rigby Capital forms part.

Together, they consist of 99 companies and over 8,500 employees, operate in 20 countries across Europe and the Middle East, and generate a £2.77bn turnover. As such, we are trusted partner to government, the military, global corporations, major charities, and thousands of medium-sized organisations.

Proud to be part of the West Midlands economic powerhouse, we are keen supporters of job creation and enterprise in the region, take our responsibility for the environment seriously, and remain active in the community. Our Charitable Trust supports a wide range of causes and our employees participate in initiatives that not only benefit society, but their own development too.

Rigby Capital's Operations and Supply Chains

Rigby Capital has grown exponentially since its inception in 2014 and, with an experienced team of senior managers, has created an agile and successful business that has an impeccable track record and long-established supplier relationships. This enables us to offer world class, bespoke funding solutions which unlock value for our clients. With such a fast-moving and evolving business we must be acutely aware of the many different facets of our operations and be alive to the challenges we face within each individual supply chain.

We have collaborative relationships with many different vendors and partners as well as strong connections with finance partners meaning our various supply chains and stakeholders are diverse. The key areas are labour, materials, goods and equipment. We actively encourage and require our partners and vendors to also operate in such a way that respects human rights and the dignity of all people.

Proactive steps to prevent modern slavery

Starting with our own business operations and service providers and then increasing the visibility we have of our global supply chains, we work to identify actual or potential risks of modern slavery and help ensure remediation where cases are identified.

During the course of the financial year, we, under the guidance of the Rigby Group has been proactively identifying and implementing steps that can be taken to ensure that we are open and transparent in the way we operate our businesses, thus ensuring that our transactions and relationships are firmly compliant with our responsibilities under the Act.

These steps can be summarised into three areas: policies and procedures, risk assessment and due diligence.

Policies and Procedures

We have independently developed and implemented our own policies and procedures on key matters such as ethics and business conduct, bribery and corruption, health and safety, whistleblowing and importantly, anti-slavery and human trafficking. These form part of our business strategy and document how to conduct ourselves as a business and individually which is appropriate, transparent and respectful of others.

These policies reflect our commitment to acting ethically and with integrity in all of our business relationships. This includes implementing and enforcing effective systems and controls in order to minimise the risk of slavery and human trafficking taking place anywhere in our business or supply chains. The Group is also in the process of setting up a confidential whistleblowing hotline/portal which, in conjunction with existing whistleblowing processes, ensures that employees across the Group, including Rigby Capital, are able to raise concerns about malpractice or wrongdoing in confidence, including in respect of slavery and human trafficking.

In addition, throughout 2020, the Group will, to the extent not already completed, ensure that all employees are fully trained in key areas such as modern slavery, bribery and ethics and business conduct and have ready access to other educational and awareness materials. The training will be mandatory.

With regards to procedures, across the Rigby Group and in particular in Rigby Capital, the ongoing monitoring and development of pre-contract and post contract processes and procedures are fundamental in order to identify and assess potential risk areas in our supply chains, mitigate the risk of slavery and human trafficking occurring in our supply chains and monitoring such risk areas.

Risk Assessment

We assess the potential human rights risks of our supply chains by considering the origin of our suppliers and by understanding and monitoring their approach to modern slavery. We endeavour to keep abreast of emerging risks through regular and transparent relations with our supplier and, in particular, maintaining strong relationships with our labour force who form a significant proportion of our supply chain.

We continue to work with our contractors, suppliers, business partners and other third party suppliers or businesses to ensure that they are open and transparent in their activities and are compliant with the Act.

Whilst regularly encouraging legal compliance, adherence to policies and practices and recruitment and reward practices, we are considering ways in which we can, amongst other things, identify and eliminate forced or compulsory labour in our workforce. This could be by way of a site audit or a HR paper exercise to ensure all individuals, no matter their employment status, have the right to work and have all the necessary paperwork required to work with or for Rigby Capital. Should the outcome of such analyses identify risk areas, these shall be re-audited within six months or sooner subject to the area of concern and the extent of such.

Due Diligence

We regularly monitor and maintain transparent relationships with our partners and suppliers to ensure they are regularly considering the impact of the Act on their organisations and, where appropriate, we will consider streamlining the number of partners and suppliers with whom we interact to mitigate any risk associated with having multiple suppliers and to engender greater partnerships so as to align our values more closely.

Future steps to prevent modern slavery in our supply chains

We understand that risks of modern slavery are dynamic and can change quickly.

We will continue to monitor the modern slavery risk by way of policy, risk assessment, training and due diligence and will seek to measure the effectiveness of steps taken to minimise such risk on a regular basis.

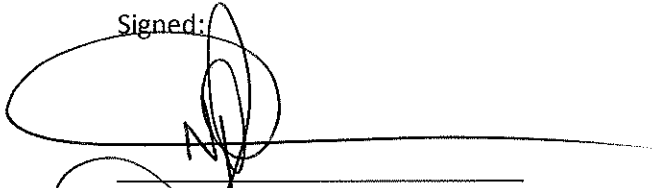
In addition to the more general training previously identified for existing employees, we are currently looking at ways to deliver the training and awareness of the risks of modern slavery to new employees as part of their induction to the business. This will ensure that new hires have an early understanding of the Group's core ethics and values and the importance that the Group and Rigby Capital places on the need to have a clear understanding of the risk of modern slavery and human trafficking.

We will continue to encourage an open and transparent culture within Rigby Capital that reiterates to all employees the intrinsic values of the Group and Rigby Capital and ensures that all employees, at any level, feel able to openly and confidentially address any concerns they may have regarding modern

slavery or human trafficking in the knowledge that matters will be taken seriously and without retaliation.

This statement was approved by the board of Rigby Capital Limited.

Signed:

A handwritten signature in black ink, appearing to be 'Nigel Jenkins', written over a horizontal line. The signature is stylized and somewhat circular.

Nigel Jenkins
Director
Rigby Capital Limited