

Modern slavery and human trafficking statement **2022**

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Our Commitment

Through our people we deliver vital services to our customers. We therefore condemn slavery in all its forms and will never tolerate it both within our businesses and across our supply chains. We will not engage in any form of human trafficking and nor will we use forced, bonded, compulsory, illegal or child labour – or knowingly work with anyone who does. Working primarily within the UK we believe our modern slavery risk is low, but we remain vigilant and continuously challenge ourselves to better understand the risk and its associated controls.

Our Structure

Restore is the UK’s leading provider of digital and information and secure lifecycle services to our business customers across the UK. The business has a relatively small supply chain and procures goods and services in excess of £160 million per year. Our customers define what outcomes or services they need from us and we deliver new and effective ways to deliver them. A summary of our business structure and our 2021 commercial performance is at Figure 1. Figure 2 illustrates our governance structure. The following are specific responsibilities within this structure (the numbers correlate to the numbers in the figure):

1. Our Chief Executive Officer, as a Restore plc Board member, holds ultimate responsibility for our human rights policy which includes our modern slavery and human trafficking commitment.
2. The Executive Committee regularly reviews Ethics and Compliance risks including human rights, modern slavery and human trafficking.
3. Business Unit Management Teams are responsible for upholding our modern slavery commitment across our contracts. They do this by ensuring the identification, prevention and mitigation of any adverse human rights, modern slavery and human trafficking impacts caused by or contributed to by Restore operations. They also monitor the actions of our customers, suppliers, business partners, or other third parties.
4. Oversight of human rights, modern slavery and human trafficking risks is undertaken by the Risk Committee, a formal committee of the plc Board.

Restore’s Ethics programme is led by the Group Head of Risk who is responsible for our ethics strategy and associated policy and governance.

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Figure 1 – Restore Commercial Structure & Performance 2021

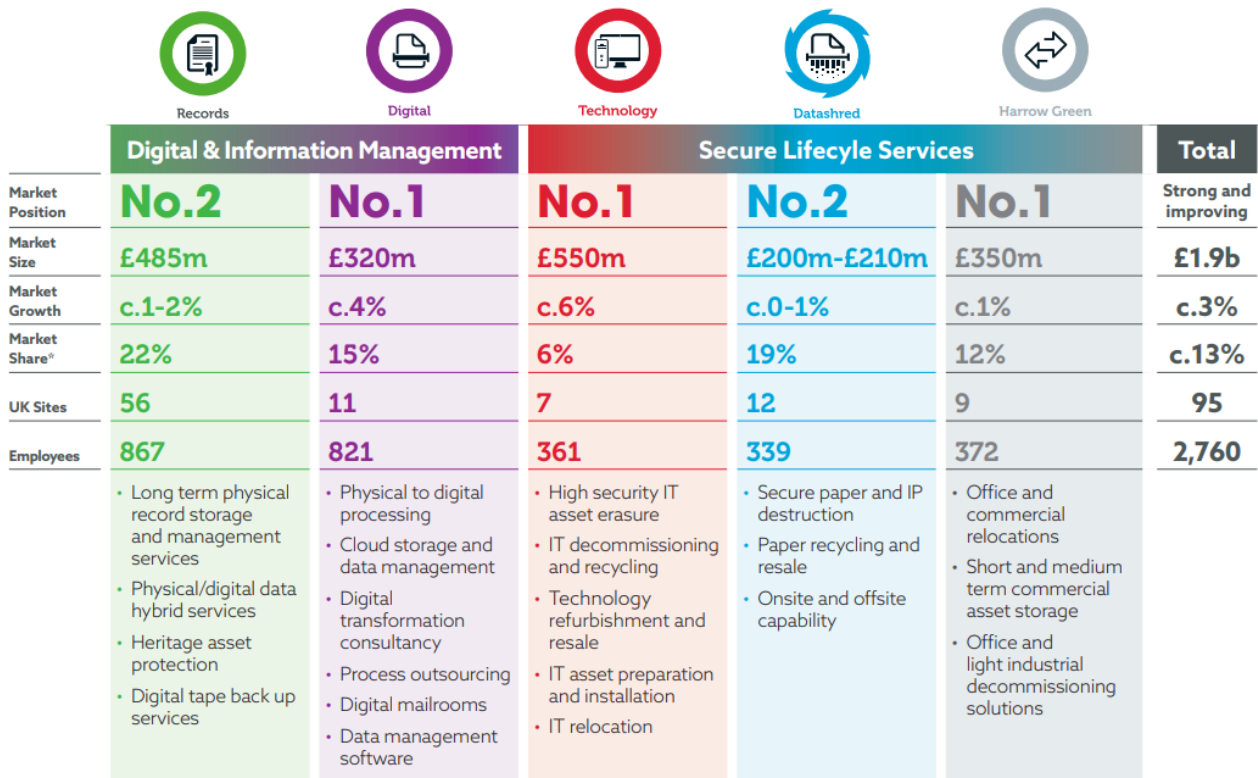
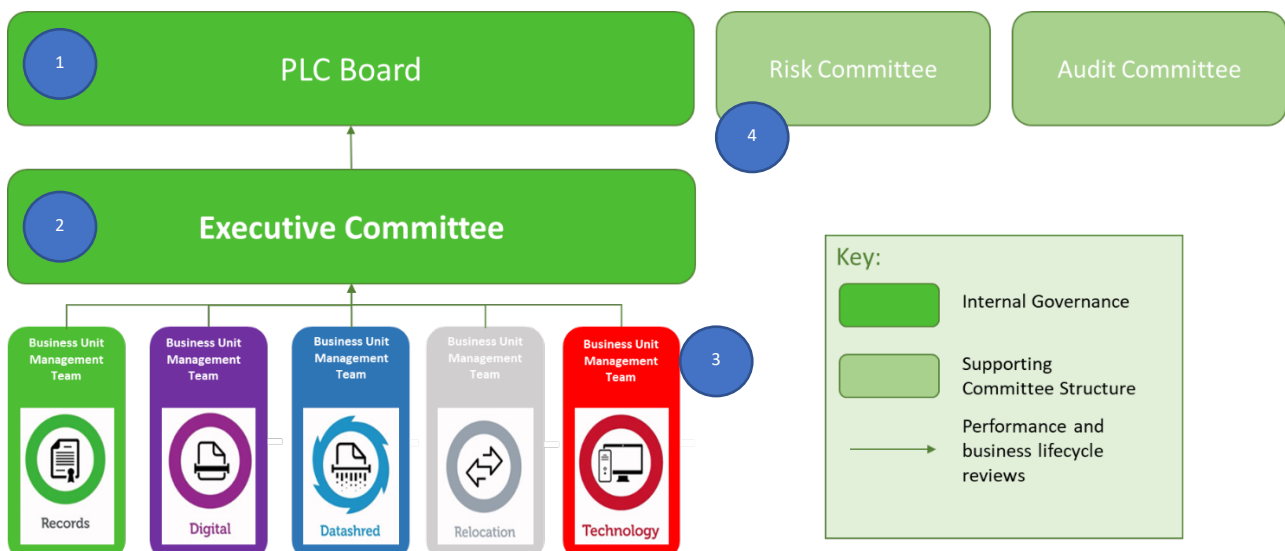


Figure 2 – Restore Governance Structure



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Our People

Restore operates across five different markets each with its own skill requirements. All of our managers and leaders are on permanent contracts and are onboarded into the business through a rigorous selection and vetting regime. The majority of our operative workforce (normally around 74%) are on permanent contracts delivering services to around 32,500 customers. These are augmented by temporary workers (the average is 500 and fluctuates with business need) sourced from suitably assured agencies.

We have also added significant additional governance around our agency providers within the last 12 months to ensure that we understand, track and monitor the specific workers that are being provided. Every contingent labour supply is required to sign up to terms to adhere to these policies and requirements, which includes the right to audit, which will begin this year.

The onset of COVID-19 gave added impetus to the modernisation of our information technology suite of tools and provided added working flexibility for our colleagues. As the country returns to normalcy, we are encouraging our colleagues to make a transition to office-based working but with the flexibility to work from home when that is appropriate.

To support flexible working and the continued improvement of information flows across Restore the company has launched a comprehensive intranet site, created workforce forums, relaunched its whistleblowing capability under the Speak Up banner, and invested in Yammer for more light-hearted team and organisation engagement. Across our workforce of nearly 3000 colleagues our engagement focus is through our workforce forums.

Finally, we provide regular training in respect of the Modern Slavery Act to our Procurement and Management Teams who are responsible for ensuring those reporting to them have read and comply with this policy which is included on the intranet site and within the company handbook.

Our Supply Chain

As a UK-based business service provider our supply chain is both relatively small and predominantly UK-based; supplying firms are therefore subject to the same strict modern slavery compliance standards. The majority of our large suppliers exist in structured markets and provide services to us: property, information technology, energy. 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

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those policies to their own suppliers. This is assured through a strict and assured procurement process

- 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.

Our Policies

Restore have a full suite of policies, which are accessible on our company intranet system, to ensure the appropriate modern slavery controls are in place across our business. This includes a full suite of human resource, procurement, and ethical policies. Working exclusively 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. Furthermore, we are developing a management control mechanism to add further rigour to our policy endorsement processes.

Importantly, we have set our purpose and are now embarked on work to define our values and develop our Code of Conduct; a Supplier Code of Conduct is to follow.

We continue to develop our risk and compliance capabilities to embrace all aspects of the threats and opportunities we face.

Risk Management

As previously mentioned, Restore operates exclusively in the UK and primarily with UK-based suppliers. Whilst this doesn't shield us from exposure to Modern Slavery risk, we assess this to be Very Low. The most likely source for this risk comes from our use of temporary staff to meet short term customer demand spikes, but we have robust controls for the selection and assurance of Employment Agencies.

Whilst we are clear about our direct suppliers more is needed to fully understand the extremities of the chain – this is work for 2022.

Our Due Diligence

As already stated, our assessment of our exposure to Modern Slavery risk is assessed to be Very Low. Indeed, Restore has yet to receive any reported instances of Modern Slavery, actual or perceived. Despite this we continue to strengthen our controls:

- We have created a centralised recruitment system and team to bolster the recruitment experience for those joining us and to add another level of control in how we recruit and onboard our colleagues.
- We have created Colleague forums to both enhance the flow of information within the business, to share best practice, and to provide another route by which issues can be raised.

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Key Performance Indicators

Restore’s approach to Modern Slavery continues to develop. The following represents a high-level action plan:

	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	
Develop Master Supplier List	→												
Develop Code of Conduct		→											
Develop Supplier Code of Conduct							→						
Broaden Compliance activity (including enhanced supplier due diligence)				→									

Key performance and risk indicators will be developed to enhance our Modern Slavery reporting.

Training

Annually all managers and leaders in the business undergo an online accredited and attested Modern Slavery awareness course. The course 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.

Our Progress

As a mark of our commitment to doing business and our belief in continuous improvement we are reviewing our governance structures and processes, developing a business ethics programme the first stage of which is to design and implement our Code of Conduct. Coincidentally we are also reviewing ethics risks and seeking to bolster and mature our supply chain controls.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes Restore plc’s slavery and human trafficking statement for the financial year ending 31 December 2020.

This statement has been approved by Restore plc Board and signed by Charles Bligh, CEO on 20 May 2022.

Restore plc has the following trading subsidiaries as at 31 Dec 21:

- Restore Plc
- Restore Datashred Ltd
- Restore Digital Ltd
- Harrow Green Ltd

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Restore Technology Ltd
EDM Group Ltd
Capture All Ltd

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