

Modern slavery and human trafficking statement **2023**

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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, information and secure lifecycle services to our business customers across the UK. The Group’s largest costs relate to people at c£127m per year followed by property, c£22m with other costs totalling c£53m and include transportation, packing and storage materials, IT and professional services. Our customers define what outcomes or services they need, and we develop new and effective ways to deliver them. A summary of our business structure and our 2022 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 Figure 2):

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.

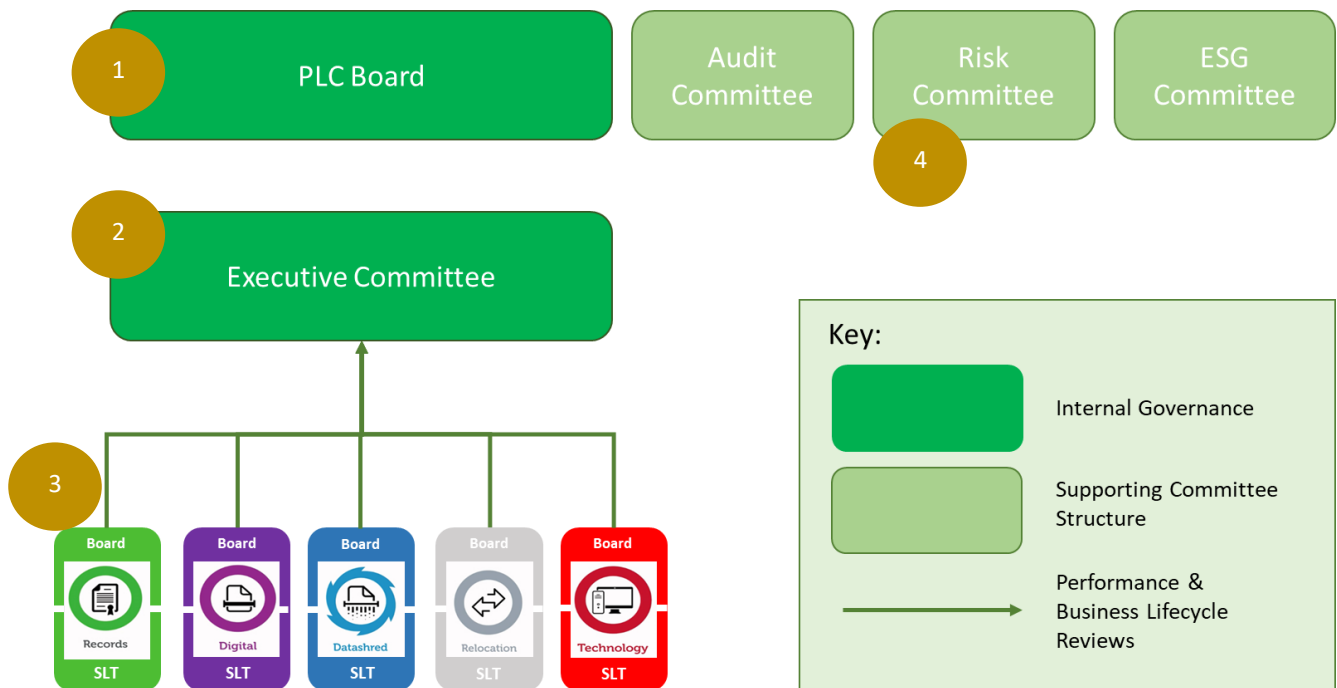
Restore’s Ethics programme is led by the Group Head of Risk who is responsible for our ethics strategy and associated policy and governance.

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Figure 1 – Restore Commercial Structure & Performance 2022

	Records	Digital	Technology	Datashred	Harrow Green	Total
	Digital & Information Management		Secure Lifecycle Services			Total
Market Position	No.2	No.1	No.1	No.2	No.1	Strong and improving
Market Size	£490m-£500m	£330m-£335m	£580m	£200m-£210m	£350m	£2.0b
Market Growth	c.1-2%	c.4%	c.5-6%	c.0-1%	c.1%	c.3%
Market Share ¹	22%	16%	6%	19%	12%	c.14%
UK Sites	52	11	7	12	9	91
Employees	975	833	431	341	301	2,881
	<ul style="list-style-type: none"> Long term physical record storage and management services Physical/digital data hybrid services Heritage asset protection Digital tape back-up services 	<ul style="list-style-type: none"> Physical to digital processing Cloud storage and data management Digital transformation consultancy Process outsourcing Digital mailrooms Data management software 	<ul style="list-style-type: none"> High security IT asset erasure IT decommissioning and recycling Technology refurbishment and resale IT asset preparation and installation IT relocation 	<ul style="list-style-type: none"> Secure paper and IP destruction Paper recycling and resale Onsite and offsite capability 	<ul style="list-style-type: none"> Office and commercial relocations Short and medium term commercial asset storage Office and light industrial decommissioning solutions 	

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 324 FTE and fluctuates with business need) sourced from suitably assured agencies.

We have also added significant 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 these policies and requirements, which includes the right to audit; we completed the first of our audit processes in 2022.

To support flexible working and the continued improvement of information flows across Restore, the company has 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 organisational engagement.

Finally, we provide regular training in respect of the Modern Slavery Act to our 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.

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 those policies to their own suppliers. This is assured through our procurement processes.
- 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.
- We are developing a Supplier Code of Conduct to codify the behaviours we expect of our suppliers across a number of business ethics areas, including Modern Slavery. We expect to publish this early in 2024.

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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, are developing our company Values, and will publish our Code of Conduct this year; a Supplier Code of Conduct is also under development and the intention is to launch it in 2023.

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 sources for this risk comes from our use of temporary staff to meet short term customer demand spikes, and our extended supply chain. For the former 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. We are exploring ways to enhance our procurement controls including third-party and supply risk management.

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:

- Our centralised recruitment and vetting processes have matured and provide a professional recruitment experience for those joining us and add further 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.

Code of Conduct

Improving our colleagues' understanding of Modern Slavery remains a critical mitigation. Central to this is the publication of Restore's new Code of Conduct which will be published in Q3 2023 (previously June).

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Training

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.

Additionally, our intranet site has further information, links, and videos for our colleagues to access.

Our Progress

As a mark of our commitment to doing business and our belief in continuous improvement we are developing a business ethics programme the first stage of which is to design and implement our Code of Conduct; we expect to publish this in 2023. In parallel, we are also reviewing ethics risks and seeking to bolster and mature our supply chain controls.

Reporting

The Company has in place a third party-managed whistleblowing facility which allows a whistleblower the opportunity to raise any concerns around slavery and human trafficking in our business and/or supply chain in a confidential and anonymous way.

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 2023.

This statement has been approved by Restore plc Board and signed by Charles Bligh, CEO on 27 June 2023.



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Restore plc has the following trading subsidiaries as at 31 December 2022:

- Restore plc
- Restore Digital Ltd
- EDM Group Ltd
- Capture All Ltd
- Restore Technology Ltd
- Ultratec Ltd
- Restore Datashred Ltd
- Harrow Green Ltd
- Ultrarecycle Ltd
- Ultratest Solutions Ltd

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