

Restore



# Modern Slavery Act Statement 2025





## Introduction

This statement by Restore plc and its trading subsidiaries (being Restore Digital Limited, Capture All Limited, Restore Technology Limited, Ultratec Limited, Restore Datashred Limited, Harrow Green Limited, Shred-on-Site Limited and Synertec Limited) (together “**Restore**” or the “**Group**”) has been published in accordance with Section 54 of the Modern Slavery Act 2015. It has been approved by the Restore plc Board on behalf of the Group and signed on behalf of Restore by Charles Skinner, Chief Executive Officer.



Charles Skinner, Chief Executive Officer

19<sup>th</sup> June 2025

## Our Commitment

Restore is committed to respecting and supporting all internationally recognised human rights and the treatment of all workers with dignity and respect. Restore operates a zero-tolerance policy in respect of all forms of modern slavery and human trafficking within its business and across our supply chains. We take all allegations of human rights abuse seriously. To report any concerns around suspected misconduct, including breach of human rights or the Modern Slavery Act 2015, you may report the issue via Restore’s confidential and independent reporting service by telephoning **0800 915 1571** or reporting online at [www.safecall.co.uk/report](http://www.safecall.co.uk/report).

## Our Business

Restore is the UK’s leading provider of secure and sustainable business services for data, information, communications and assets, with 2024 annual revenues of c.£275m. The



business procures goods and services with a value of c.£130m per year. Our supply chain is principally UK-based.

Restore’s business consists of four divisions. A summary of our business structure and market positioning is shown at Figure 1 below.

Figure 1 – Restore Business Structure & Market Positioning, taken from Restore plc’s Annual Report 2024.



## Our Risk Assessment and Management

Restore operates principally in the UK and primarily with UK-based suppliers. Whilst this does not shield us from exposure to modern slavery risk, we assess the risk to be very low. The most likely sources for this risk come from our use of temporary staff to meet short-term customer demand spikes and projects, and our extended supply chain.

For the former we have robust controls for the selection and assurance of employment agencies (see Our People below).

For the latter, we are seeking to further improve our on-boarding and on-going supplier due diligence and to better understand what due diligence our suppliers carry out on their supply



chain. We are continually exploring ways to enhance our procurement controls (see Our Supply Chain below).

To date, Restore has not received any reported instances of modern slavery, actual or perceived. However, we remain vigilant and continuously challenge ourselves to better understand the risk and the associated controls.

## Our People

Restore operates across four different markets each with its own skill requirements. As at 1<sup>st</sup> June 2025, Restore employed c.2,650 people. All of our managers and leaders are onboarded into the business through a rigorous selection process. The majority of our operative workforce are on permanent contracts delivering services to our customers. These are augmented by temporary agency workers (up to c.300 depending on specific business need driven by in-flight projects) sourced from suitably assured agencies.

We operate a stringent vetting process to ensure that Restore is both legally compliant and also compliant with the varying requirements of our customers depending on the nature of their business and the regulations that they themselves are subject to. As mandated in our Right to Work and Screening Policy, all employees are subject to thorough right to work checks and pre-employment screening (which will vary depending on the nature and seniority of the role). In addition, employees may also be subject to a Baseline Personnel Security Standard (BPSS) check, a BS7858 check, a DBS check and also a Security Check (SC)/Developed Vetting (DV) Clearance, again in each case depending on the role, as well as the legal and contractual requirements relevant to the nature of the information processed by an individual.

We continue to operate 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 our policies and requirements, which includes the right to audit.

As a business, we continue to encourage employees to spend the majority of their working week in our offices and sites where possible, whilst acknowledging the long-term structural shift towards more flexible working patterns. We do believe that being physically present in an office environment has benefits, not least to help our People and Management teams to maintain personal contact with our workforce. In order to support flexible working and the continued improvement of information flows across Restore, Restore has a Flexible Working Policy, a comprehensive intranet site (Circle), has created workforce forums (for example, Employee Voice Forums, LGBTQ plus, Armed forces and Minority Ethnic Forum amongst



others) and we continue to offer Viva Engage via Restore's intranet for more informal team and organisational engagement.

In late 2024 we implemented a new third party on-boarding platform (Eploy). This has strengthened our group-wide onboarding approach across the Group and ensures a trackable audit trail of pre-onboarding requirements as well as reportable, digital acceptance of employment terms and conditions and reporting for both candidate and hiring manager tasks. In addition, the platform requires new employees to read and confirm acceptance of key compliance policies, including Restore's Code of Conduct, as well as other policies specific to certain roles.

## Our Governance

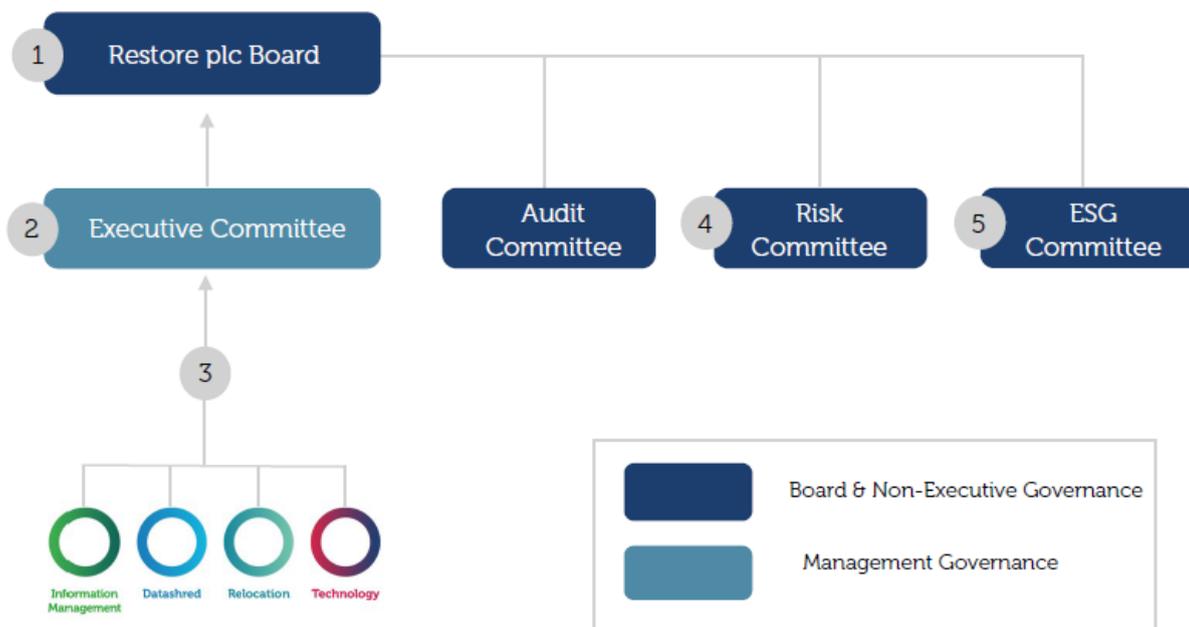
Figure 2 below illustrates our governance structure. The following describes the specific responsibilities of the governance bodies within this structure (the numbers correlate to the numbers in Figure 2):

1. Charles Skinner, the Chief Executive Officer, and the Restore plc Board hold ultimate responsibility for our ethics and compliance framework, including our Code of Conduct which (amongst other things) sets out our commitments on respecting human rights and preventing modern slavery. Compliance policies across the Restore Group are regularly reviewed (typically annually) with any new policies or material changes to existing policies being approved by the Board.
2. The Executive Committee, consisting of the Chief Executive Officer, Chief Financial Officer, General Counsel/Company Secretary and the divisional MDs, keeps ethics and compliance risks across each division under review, including in relation to human rights, modern slavery, and human trafficking.
3. Divisional management teams are responsible for upholding our modern slavery commitment across our contracts and external relationships. They do this by ensuring the identification, prevention, and mitigation of any adverse human rights, modern slavery and human trafficking impacts caused or contributed to by Restore operations. They also monitor the actions of our customers, suppliers, business partners and other third parties.
4. The Risk Committee, which reports to the Board and is chaired by Lisa Fretwell (non-executive director), meets quarterly to review risks across the Group including in relation to areas of compliance such as modern slavery and human trafficking.
5. The ESG Committee is chaired by Lisa Fretwell (non-executive director) and consists of all directors of Restore plc. The committee is attended by the Director of Group Finance and



the General Counsel/Company Secretary, who have responsibility (respectively) for the environmental and governance elements of our Group ESG Strategy, Restoring our World. Dan Baker (Chief Financial Officer) has responsibility for the social elements of the ESG Strategy. The Committee meets bi-annually and is supported by sub-committees formed of cross-functional senior employees from across the Group, focussing on (for example) fleet and our property portfolio.

Figure 2 – Restore Governance Structure





## Our Policies

Restore's compliance programme is led by the General Counsel and Company Secretary who is responsible for our compliance strategy and the associated policies and governance. He is supported by the Heads of Compliance and their respective teams for each division. Our compliance policies are available on our intranet (Circle) with some also available on our external website(s) as appropriate. This includes a full suite of human resource and ethical policies. Working principally 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. All policies are regularly reviewed and updated as required.

The Restore policies relevant to slavery and human trafficking and mitigating the risk around these areas include the following:

1. **Code of Conduct:** Focussed on our employees, Restore's Code of Conduct outlines the values we hold as a company, the way we operate our business and how we treat each other and those we work with.
2. **Speak Up Policy:** This is the policy that sets out our commitment to open and transparent reporting of concerns within the workplace or otherwise connected with how we do business. It provides the details of our Safecall whistleblowing facility (also included in our Code of Conduct and Supplier Code of Conduct) which is available at all times to both employees and third parties.
3. **Supplier Code of Conduct:** This policy sets out our expectations as to how our suppliers conduct their businesses.
4. **Anti-Bribery and Corruption Policy:** This policy is underpinned by our online gift and hospitality declaration and approval process through Circle (our intranet).
5. **Dignity at Work Policy:** This policy outlines Restore's commitment to providing a workplace free from discrimination, harassment, victimisation and bullying.
6. **Declaration of Interest Policy:** This policy is supported by the annual online declaration of interest process which was re-launched in February 2025, requiring all senior employees to declare any potential conflicts and outside interests.
7. **Right to Work and Screening Policy:** This policy describes the checks that are carried out before anyone is employed by Restore and the more involved vetting process for those with access to Government assets or otherwise working in regulated/security environments.



## Our Training

We mandate regular on-line compliance training, including in relation to Modern Slavery, to management teams and other relevant staff members. The on-line training platform was updated in 2024 to improve the user experience and the range of training materials available. Importantly the training platform is accessible via an app, which helps us reach colleagues who may not have a computer but will have a smartphone. All employees are required to complete certain mandatory training programmes on an annual basis and the platform allows completion levels to be monitored and followed-up on as required.

The modern slavery training module 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 on the topic of modern slavery.

## Our Supply Chain

As a UK-based business services provider, our supply chain is predominantly UK-based; suppliers are therefore subject to the same modern slavery legislation as ourselves. The majority of our large suppliers exist in structured markets and provide services to us, for example, property, information technology and energy providers. We therefore assess our supply chain modern slavery exposure to be very low. We seek to ensure that our suppliers maintain these standards through our divisions' procurement processes which require suppliers to undertake a supplier on-boarding process and, where possible, to sign up to our standard supplier terms and conditions which require adherence to certain mandatory Restore policies.

Our supplier on-boarding and due diligence capability has been enhanced during H1 2025 through our partnership with Achilles, our preferred platform for supply chain risk assessment. This will enhance the rigour and efficiency of our supplier on-boarding process and allow us to replace our manual questionnaire processes with a more scalable and consistent process.

Our initial focus has been on on-boarding our existing key suppliers on the platform (based on spend and criticality). The next steps for the remainder of 2025 and beyond include:

- updating and enhancing our on-boarding process for new suppliers to incorporate the Achilles process and to ensure a consistent approach across our divisions; and



- continuing the on-boarding of our existing suppliers and risk assessing.

# Restore



To get in touch, visit us at:  
[restoreplc.com](http://restoreplc.com) and [restore.co.uk](http://restore.co.uk)