

# Statement

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Modern Slavery Act 2015

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## Introduction

This statement is made on behalf of RPMI Limited (“RPMI”).

Modern slavery, in all its forms of slavery and servitude, forced or compulsory labour and trafficking is a crime, and a violation of fundamental human rights, which will not be tolerated within our own business, or in any of our supply chains.

We are proud of the steps we have taken to combat slavery and human trafficking at RPMI. We have a zero-tolerance approach to modern slavery, and are committed to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls.

We are also committed to ensuring there is transparency in our approach to tackling modern slavery throughout our supply chain, and we expect the same high standards from all of our contractors, suppliers and other business partners.

## RPMI

RPMI was born out of the rail industry. We employ circa 450 employees across three locations in Darlington, London and Coventry. Today we continue to support over 100 employers within the Railway Pension Scheme in relation to investment management, currently managing approximately £30bn of assets for the Scheme. This puts the Scheme within the top five pension funds in the UK, in terms of assets under management.

Our purpose, to 'secure our members' future', is at the heart of everything we do and will continue to be in the years ahead.

## Our HR Policies

We have robust HR policies and procedures in place, and an employee Code of Conduct to ensure the fair treatment of all employees. We comply with all applicable employment legislation relating to employee terms and conditions, including payroll, and we invest in supporting the health and wellbeing of our staff.

We carry out fair and transparent recruitment processes and ensure that our recruitment agencies comply with these requirements in the provision of agency staff, through regular meetings in which practices are reviewed.

## Our Investment business

RPMI will exclude companies from our listed equity portfolios, on an exceptional basis, for severe conduct controversies, which could include modern slavery.

## Our Systems

Our systems are designed to ensure effective risk assessment and management in relation to slavery and human trafficking risks:

- Identify and assess potential risk areas in our supply chains;
- Mitigate the risk of slavery and human trafficking occurring in our supply chains;
- Monitor potential risk areas in our supply chains; and
- Protect Whistle Blowers

## **Our Supply Chain**

We consider that we are a relatively low risk operation in respect of modern slavery. Our supply chain only extends to goods and services for our UK office operations, including:

- Communications and IT equipment services
- Temporary/Agency staff
- Various professional services
- Office equipment and supplies
- Utilities
- Facilities management services

## **Supplier adherence and our values and ethics**

We have a zero tolerance policy to slavery and human trafficking. To ensure our contractors, and all those in our supply chain, comply with our values and ethics, we have in place rigorous selection, due diligence and tender processes, which are designed to ensure our suppliers, and their supply chains, are slavery free.

As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery or servitude, whether adult or children.

As part of our Supplier Capability and Due Diligence process, and ongoing monitoring of our supply chain, we carry out regular reviews to ensure suppliers are assessed, and the information held on our supply database is kept up to date. This may include supplier audits or on-site assessments dependent on the nature of the goods or services being provided and in the industry sector in which the supplier operates. If an audit reveals risks of modern slavery, this would result in termination of the supplier's contract.

We encourage anyone, including employees, subcontractors, suppliers and customers to report, in good faith, any issue or concerns about potential unethical business practices, such as fraud and bribery or slavery and human trafficking through our confidential whistle blowing procedure.

## **Training**

A full review of HR Policies and Practices is currently being performed. These will be updated, as necessary, and targeted training carried out throughout the organisation.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes RPMI Limited's slavery and trafficking statement for the financial year ending 31 December 2019.

John Chilman  
Chief Executive  
5 May 2020